

Volume 3

# FINAL ENVIRONMENTAL IMPACT STATEMENT

*on a*  
**Proposed Nuclear Weapons Nonproliferation  
Policy Concerning Foreign Research Reactor  
Spent Nuclear Fuel**

## **Public Comments and Department of Energy Responses Part 3a – Individuals (Pages 2.7-1 through 2.7-530)**



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United States Department of Energy  
Assistant Secretary for Environmental Management  
Washington, DC 20585

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Volume 3 is organized into three sections:

- Section 1 - Overview
- Section 2 - Written Comments and Responses
- Section 3 - Public Hearings

The Overview sets the tone for the document by summarizing the public comment process, by explaining how the receipt of written comments and the public hearing process were handled, and by summarizing the major issues raised by commentors and DOE's responses to these issues.

Section 2 of Volume 3, "Written Comments and Responses" contains all of the written comments received by DOE on the draft EIS. Upon receipt, these documents were assigned a sequential log number to be used in tracking during the comment response process. For presentation in Volume 3, these documents maintained their original log number, but were separated into the following seven distinct "affiliation" categories:

- Section 2.1 - Federal Government
- Section 2.2 - State Government
- Section 2.3 - Local Government
- Section 2.4 - Native American Groups
- Section 2.5 - Non-Government Organizations
- Section 2.6 - Foreign Entities
- Section 2.7 - Individuals

Since these documents retained their original log number, the reader should note that while the documents in each respective section are in ascending order, their numbering therein is not sequential.

In order for a reader to find a specific document, a full "List of Commentors" has been included in each book (or part) of Volume 3, immediately following the "Table of Contents." This "List of Commentors" has been compiled alphabetically using either the commentors last name, the name of the submitting organization, or the name of a Federal, State, Tribal, or local government branch. City and State government bodies are listed under "City of" or "State of." Members of Congress are listed by the Senator's or Representative's name, with the government branch following.

To locate a document(s):

1. Find the "List of Commentors" and the name of the individual submitting the comment (or the name of the organization or agency if the comments were submitted on their behalf), and note the page number assigned to the first page of the comment document (i.e., a document from a Native American Group would be number 2.4-1, etc.).
2. Find the Volume 3 book (or part) that contains the section and page number for which you are looking and turn to the appropriate page to find a scanned copy of the document along with the responses to each of the comments delineated therein.

the written comments, the comments received during each of the 17 public hearings. Oral comments provided at these hearings have been summarized, rather than individually identified by each respective speaker. As such, there is not a list of speakers or identification of the commentors at the public hearings. A list of all registered attendees is provided immediately following the summary of each of the public hearings.

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## **SECTION 2.7**

## **INDIVIDUALS**

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USE TO COMMENT  
3: THOMAS, HENRY G.

federal Court Order which the commentor references, or the actions/inactions of the parties directly involved. To comment on the specific issue raised.

ater quality as it pertains to the proposed policy of spent nuclear fuel, DOE considers that there would be of the ports that might be used to accept the material. tasks are designed and built to preclude release of radioactive material has ever been released from a spent result" of an accident. A paragraph has been added to thi. <sup>thi</sup> <sup>ant</sup> and to emphasize the no-impact nature of ality. In the unlikely event of a severe accident, the ates that some radioactive material could be released the environment. However, the analyses in Section 2.5 of the EIS determined that no decontamination, perty would result from the worst plausible accident. sk would likely require some cleanup, but the overall in the port would be very small.

SECTION 2.7: INDIVIDUALS

**RESPONSE TO COMMENT  
INTOR No. 4: JENSEN, M.**

**p. 4-1**

tion D.2.1.1 of the EIS has been revised to indicate that I -  
the City of Charleston.

**COMMENTOR No. 5: McGAHEE, BERNY****RESPONSE TO COMMENT  
COMMENTOR No. 5: McGAHEE, BERNY****Written Comments on the Draft Environmental Impact Statement  
on a Proposed Nuclear Weapons Nonproliferation Policy  
Concerning Foreign Research Reactor Spent Nuclear Fuel**

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Berny McGahee Phone: 706-860-2917  
 Title and Organization: Concerned citizen  
 Address: 122 Latrion Ct.  
 City: Augusta State: GA Zip: 30907

**...COMMENTS...**

The second best option is to process plant fuel at SRS by existing technologies on site known as chemical separation & vitrification.  
Building spent fuel with a multi-purpose reactor at SRS only makes common sense if we  
use technology on mission of SRS to lead with no proliferation of nuclear weapons

**Response to Comment No. 5-1**

The commentor's preference for chemical separation of foreign research reactor spent nuclear fuel at the Savannah River Site is noted. This is Management Alternative 1, Implementation Alternative 6, and is discussed in Sections 2.2.2.6 and 4.3.6 of the EIS.

**Response to Comment No. 5-2**

DOE is considering the use of a multi-purpose reactor as part of its decision on the Tritium Supply and Recycling EIS. DOE is also considering the use of a multi-purpose reactor as part of its decision on the Storage and Disposition of Weapons-Usable Fissile Materials EIS, dealing primarily with plutonium. This foreign research reactor spent nuclear fuel EIS will not lead to any decision on the use of a multi-purpose reactor.

**To Mail in Comments, Address Correspondence to:**

Mr. Charles R. Head  
 Office of Spent Fuel Management, EM-37  
 U.S. Department of Energy  
 100 Independence Avenue, SW  
 Washington, DC 20585-0001

McGAHEE, BERNY**RESPONSE TO COMMENT  
COMMENTOR No. 6: MCGAHEE, BERNY**

1, 1995

processing of spent nuclear fuel at the recycling and glassification plant that materials. "The capability is here, so that the mission will be cost-effective to do the country's spent fuel and do it over this, the chances of rogue for nefarious purposes such as

***Response to Comment No. 6-1***

The commentor's support for using the Savannah River Site's facility for chemical separation of the foreign research reactor spent nuclear fuel is noted. Chemical separation at the Savannah River Site is part of Implementation Alternative 6 of Management Alternative 1 in the EIS. Section 2.2.2.6 of the EIS describes this alternative and Sections 2.4 and 2.6.5.2 describe the chemical separation facilities.

***Response to Comment No. 6-2***

A multi-purpose reactor, if it is built, would burn plutonium, not spent nuclear fuel from foreign research reactors. The decision to build a multi-purpose reactor is outside the scope of this EIS.

6-1

6-2

6-1  
(Cont'd.)

ing using a multi-purpose reactor that electricity. This should expedite the is. ar 40 years has earned it a nuclear- t a most desirable location for future upported the projects at SRS, and

Mr. [redacted]  
Lithgow Cr.,  
Line 2, Ge. 30107

Mo. 860 - 2917

**RE TO COMMENT  
No. 9: PECK, DIANE**

ing foreign research reactor spent nuclear fuel through  
ever, analysis in Sections 4.2.2 and 4.5 of the EIS  
bringing spent nuclear fuel to the Port of Galveston,  
s low.

erses management of foreign research reactor spent  
gment Alternative 2, which is discussed in Sections

is to support U.S. nuclear weapons nonproliferation  
ually eliminate, the use of highly enriched (weapons-  
wide (Section 1.2 of the EIS). Past and present  
n policies of the United States support peaceful  
such as research reactors for nations who agree not to  
e of LEU fuel is encouraged by the United States and  
y Act of 1992, no new export licenses for HEU have

e addition of spent nuclear fuel from foreign research  
of nuclear waste in the United States is noted. As  
e EIS, acceptance into the United States of the spent  
reactors would increase the existing inventory of spent  
percent by mass and ten percent in volume.

**COMMENTOR No. 10: BRONDALIS, PHILIP**

**RESPONSE TO COMMENT**  
**COMMENTOR No. 10: BRONDALIS, PHILIP**

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**Written Comments on the Draft Environmental Impact Statement  
 on a Proposed Nuclear Weapons Nonproliferation Policy  
 Concerning Foreign Research Reactor Spent Nuclear Fuel**

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

(409)

Name: Philip Brondal Phone: 765-7766  
 Title and Organization: \_\_\_\_\_  
 Address: 3115 Avenue P  
 City: Galveston State TX Zip 77550

\*\*\* COMMENTS \*\*\*

I am against this in Galveston!

**Response to Comment No. 10-1**

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Galveston is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Galveston, or to any port analyzed in the EIS, is low.

10-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head  
 Office of Spent Fuel Management, EM-37  
 U.S. Department of Energy  
 1000 Independence Avenue, SW  
 Washington, DC 20585-0001

**COMMENTOR No. 11: WEBER, DENISE****RESPONSE TO COMMENT  
COMMENTOR No. 11: WEBER, DENISE**

**Written Comments on the Draft Environmental Impact Statement  
on a Proposed Nuclear Weapons Nonproliferation Policy  
Concerning Foreign Research Reactor Spent Nuclear Fuel**

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

(Go? )

Name: DENISE WEBER Phone: 765-7766  
 Title and Organization: 3115 Avenue P  
 Address: GALVESTON ISLAND State TX Zip 77550

## \*\*\* COMMENTS \*\*\*

I AM OPPOSED TO ANY NUCLEAR WASTE BEING  
BROUGHT THROUGH GALVESTON. THIS MOVE TO OUTSIDE PEOPLE  
THIS "SAVES THEM" IS NOTHING BUT A RISK.  
THAN IT IS WORTH TO OUR RISKS.  
IF THE PEOPLE THAT ARE TRYING TO "SELL THIS"  
LIVED HERE... THAN THEY WOULD NOT WANT IT HERED.

I agree with all of the mentioned risks.

I AM AGAINST THIS BEING  
CARRIED DOWN OUR THROATS!

To Mail in Comments, Address Correspondence to:

Mt. Charles R. Head  
 Office of Spent Fuel Management, EM-37  
 U.S. Department of Energy  
 1000 Independence Avenue, SW  
 Washington, DC 20585-0001

**Response to Comment No. 11-1**

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Galveston is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Galveston, or to any port analyzed in the EIS, is low.

11-1

## SECTION 2.7: INDIVIDUALS

**H, MARK**

ough such a policy would, the nuclear waste issue, the fuel that is addressed by this developed. The intent of the possible from civil programs to convert their reactors to of their LEU spent nuclear :cially since the amount of elsewhere in the public and

areas within the context of hat Galveston Bay has been the commentator's statements d populations near the Port can adverse impacts to any reactor spent nuclear fuel. built to preclude release of ever been released from a ident. A paragraph has been to emphasize the no-impact unlikely event of a severe some radioactive material environment. However, the EIS determined that no would result from the worst would likely require some in the port, and on wildlife

**RESPONSE TO COMMENT  
O. 13: MUHICH, MARK (CONT'D.)**

**O. 13-3**

the inclusion of the Port of Galveston as a potential port of  
actor spent nuclear fuel is noted.

**O. 13-4**

storage site for foreign research reactor spent nuclear fuel.  
ch reactors would remain in port only as long as necessary  
, documentation, and loading for transportation to an interim  
under normal circumstances, less than 24 hours. Section  
is port activities.

**O. 13-5**

the Governor of each State and any Tribal chair, or their  
tion route seven days prior to shipment of hazardous cargos,  
als. It would be the responsibility of the Governor to provide  
tate and local officials.

security, and coordination of DOE with local emergency  
ould be involved with the acceptance and transportation of  
it nuclear fuel will be discussed in detail in the Transportation  
ed prior to any individual spent nuclear fuel shipment and  
local officials. The general provisions of the Transportation  
ix H, which was added to the final EIS in response to public

**O. 13-6**

the Port has the authority to prevent the unloading of a cargo  
port cannot safely receive that cargo. If port officials believe  
ctor spent nuclear fuel could not or would not be transported  
the 24 hours estimated by the calculations in the EIS, then  
ld be contacted. The Captain of the Port could then consider  
foreign research reactor spent nuclear fuel.

**Commentator No. 15: HANSEN, DICK**

**RESPONSE TO COMMENT**  
**COMMENTATOR No. 15: HANSEN, DICK**

---

**the Draft Environmental Impact Statement  
 Nuclear Weapons Nonproliferation Policy  
 Los Alamos National Laboratory Spent Nuclear Fuel**

Dear Commentator No. 15:

I am pleased to receive your comments on the Draft Environmental Impact Statement. I am also pleased to note that you have chosen to support the proposed policy.

As you may know, the Department of Energy (DOE) has been working to reduce the amount of plutonium in the United States. This will help to ensure that the United States remains a leader in global commerce.

Thank you for your support of the proposed policy.

Phone: \_\_\_\_\_  
 Fax: \_\_\_\_\_

State: \_\_\_\_\_ Zip: \_\_\_\_\_

\*\*\* COMMENTS \*\*\*

I support the proposed policy. It is important to reduce the amount of plutonium in the United States. This will help to ensure that the United States remains a leader in global commerce.

**Response to Comment No. 15-2**

The commentor's support for the chemical separation of the foreign research reactor spent nuclear fuel, and dry storage of the resulting waste, is noted. Chemical separation in the United States is discussed in Sections 2.2.2.6 and 4.3.6 of the EIS.

Respectfully yours,

Dick Hansen

**Response to Comment No. 15-1**

The commentor's support for the proposed policy is noted. DOE and the Department of State consider that it is imperative that the United States maintain its leadership role in reducing the amount of HEU in global commerce.

**Response to Comment No. 15-2**

The commentor's support for the chemical separation of the foreign research reactor spent nuclear fuel, and dry storage of the resulting waste, is noted. Chemical separation in the United States is discussed in Sections 2.2.2.6 and 4.3.6 of the EIS.

Respectfully yours,

Dick Hansen

**COMMENTATOR No. 18: Quinn, Robert****RESPONSE TO COMMENT  
COMMENTATOR No. 18: Quinn, Robert**

**TO:** DEPARTMENT OF ENERGY  
**FROM:** ROBERT QUINN,  
 P.O. BOX 10177  
 SOUTHPORT, N.C. 28461  
 (910) 457-5121

**SUBJECT: MOVEMENT OF NUCLEAR WASTE FROM SUNNY PT. BY RAIL**

The Department of Energy environmental study to determine the feasibility of shipping nuclear waste by rail through Sunny Point Army Ocean Terminal has missed some significant points.

The study, while claiming research slanted to the conservative side, has missed significant data. In Volume 1, para. 3.2.1.5 Military Ocean Terminal Sunny Point, NC, p. 3-23 it is stated that the terminal is serviced by well maintained roads, 98 miles of a U.S. Army rail line connecting to CSX and that the 1990 population within 10 miles was 7995. It further states on p. 3-25 that ENVIRONMENTAL CONDITIONS are the same as the Port of Wilmington.

The Brunswick County Land Use Plan states, "it is anticipated that the following roads would be experiencing capacity related problems during the period 1988-2003". This includes the Hwy 133/B7 areas of Sunny Point. The Land Use Plan further documents that correction of this problem is not in the state plan.

The county planning document shows a seasonal population of approximately 60,000 within 10 miles. The season runs for an extended period.

Sunny Point and its associated rail facilities run through the middle of an intense "lime sink community".

The study has failed to grasp the impact of the actions of the U.S. Army in granting consent agreements to a mining operation without knowing the hazards associated with the activity. This impact relates to the area in general and the rail line upon which Department of Energy nuclear waste will be shipped specifically.

What is most disconcerting to the citizens in the Brunswick County area is the fact that numerous studies by FEDERAL AGENCIES document these dangers in detail, yet, it is not discussed and not addressed in the study.

**18-1****18-2****18-3****Response to Comment No. 18-1**

The U.S. Army rail line mentioned by the commentator was used by DOE for the urgent relief acceptance of foreign research reactor spent nuclear fuel discussed in Section 1.5 of the EIS. Tourist or seasonal populations were not considered in the population figures used for the "human population" port selection criterion (Criterion 5), only resident populations as indicated by the 1990 census. As shown in Appendix D, Section D.1.9.5 of the EIS, the seasonal population figure of 60,000 within 10-miles of MOTSU given by the commentator is still lower than the other 9 ports described in Section 3 of the EIS.

The environmental conditions mentioned by the commentator relate to the Cape Fear River and surrounding area, and is an accurate description of the affected environment for both MOTSU and the Port of Wilmington, NC.

In regard to Routes 133/87 "experiencing capacity related problems" during the period 1988-2005, DOE considers that if the foreign research reactor spent nuclear fuel is accepted into the United States through MOTSU, the contribution to traffic from this effort would be negligible. The maximum number of casks that might be accepted under this proposed action is approximately 721 (736 if targets were included). Even if all of them were to be accepted through MOTSU, this amounts to an average of one shipment per week over the proposed 13 year acceptance period under the basic implementation of Management Alternative 1 (less if a hybrid alternative under Management Alternative 3 were adopted).

DOE estimates that the transportation of foreign research reactor spent nuclear fuel would have about the same impact on the structural integrity of local roadways and bridges as the commercial transportation of gravel and cement. As discussed in Table B-14 in Appendix B of the EIS, transportation reactor spent nuclear fuel weigh between 10.9 and 25.5 metric tons. Including the truck (an 18-wheeler), the total weight would be approximately 24 to 38 metric tons. For comparison, commercial ten-wheel sand and gravel trucks usually weigh almost 30 metric tons when fully loaded. Newer sand and gravel trucks which have an additional axle can weigh as much as 34 metric tons.

Since the number of trucks would be limited and their weight would be within the legal limits, the added burden to the State highways would be minimal.

**Response to Comment No. 18-2**

The EIS does not specifically address the possibility of a train carrying a cask of foreign research reactor spent nuclear fuel falling into a sinkhole. The EIS does, however, address a broad range of accidents involving dropped casks. This broad range of accidents covers some that are more severe than the falling into a sinkhole scenario. Section 4.2.3 of the EIS describes environmental effects for the most severe accidents which might reasonably occur.

## SECTION 2.7: INDIVIDUALS

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**RESPONSE TO COMMENT  
MENTOR No. 18: QUINN, ROBERT (CONT'D.)**

***to Comment No. 18-4***

stands the potential impact that would be associated with the development of along the rail track in the area of Sunny Point, N.C. DOE, however, would like that the transportation casks that would be used to transport the foreign actor spent nuclear fuel are designed and certified to survive drops of 30 feet yielding surface. Sinkholes are rarely 30 feet deep and they have soft soil a cask carrying foreign research reactor spent nuclear fuel would survive a fall hole without releasing any of its radioactive contents. The standards for spent rail transportation casks have been summarized in Figure B-7 of Appendix B of

***to Comment No. 18-5***

reviewed the issue of sinkhole development in and around the Sunny Point railroad. As explained in the response to comment 18-4 above, a sinkhole to appear at the time a foreign research reactor spent nuclear fuel transportation d be passing over on the rail line. The risk of releasing radioactive material ant nuclear fuel transportation tank as the result of a sinkhole event is low. tion casks are designed to withstand significant punishment without releasing nts (Section 2.6.2 of the EIS). Therefore, a sinkhole event, even if it damaged s, would not be expected to compromise the spent nuclear fuel transportation existence of any consent agreement between the Corps of Engineers and mining outside the scope of this EIS.

**COMMENTOR No. 19: BROWN, PAULA**

***RESPONSE TO COMMENT***  
***COMMENTOR No. 19: BROWN, PAULA***

**Written Comments on the Draft Environmental Impact Statement  
on a Proposed Nuclear Weapons Nonproliferation Policy  
Concerning Foreign Research Reactor Spent Nuclear Fuel**

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Paula Brown Phone: 910-257-4994  
Title and Organization: Citizen  
Address: P.O. Box 1242  
City: Burgaw State NC Zip 28425

**\*\*\* COMMENTS \*\*\***

Previous need to know or shewout date to State  
officers ONLY. - Shippers become media  
channel and influence public opinion.

Most local citizens believe in the ability of local  
and state officials to protect themselves and property.  
Most citizens ~~believe~~ believe, as well, that if it  
is in the best interest of the U.S., local sacrifice is  
worth while.

**19-1****Response to Comment No. 19-1**

DOE is required to inform the Governor of each State and any Tribal chair, or their designee, along a transportation route at least seven days in advance of each shipment of hazardous cargos, including radioactive materials. It would be the responsibility of the Governor to provide any further notification to State and local officials.

**19-2****Response to Comment No. 19-2**

The commentor's position that local and State officials are capable of responding to an emergency involving spent nuclear fuel from foreign research reactors is noted. Emergency management and response are discussed in Section 2.7 and Appendix H, which was added to the final EIS in response to public comments. As demonstrated by the analysis in Section 4 of the EIS, the risks associated with implementation of the proposed action to health or the environment would be low.

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head  
Office of Spent Fuel Management, EM-37  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-0501

**RESPONSE TO COMMENT  
COMMENTOR No. 20: PENNOCK, JOYCE E.**

**PENNOCK, JOYCE E.**

al Impact Statement  
Iteration Policy  
for Nuclear Fuel

free to use this page and drop it  
you may mail your comments to  
So, please provide us with your  
p information or any questions  
allow us to properly indicate the  
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one: 910 - 457-6050

ie N.C. Zip 28461

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**Response to Comment No. 20-1**

The Energy Policy Act of 1992 prohibits the United States from selling HEU to foreign nations except in narrowly defined circumstances. No new export licenses for HEU have been issued by the United States since passage of this Act. The intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS).

**20-1**

## SECTION 2.7: INDIVIDUALS

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**RESPONSE TO COMMENT**  
**COMMENTOR No. 24: MICALLEF, PAUL**

**COMMENTOR No. 24: MICALLEF, PAUL**

nts on the Draft Environmental Impact Statement  
 and Nuclear Weapons Nonproliferation Policy  
 Foreign Research Reactor Spent Nuclear Fuel

written comments, please feel free to use this page and drop it  
 when you leave. Alternatively, you may mail your comments to  
 at the address listed below. Also, please provide us with your  
 one number for any follow-up information or any questions  
 or comments. This will also allow us to properly indicate the  
 the comment response document. Thank you.

MICALLEF      Phone: 510 932-1766

VISTA RD.

REEE      State CA      Zip 94538

\*\*\* COMMENTS \*\*\*

I wish my wife is absolutely opposing  
Transportation, and storage of  
in and through Concord, Calif.  
use of the United States taking the  
radioactive fuel for 28 foreign countries.  
of government agency responsibility  
result in year ability to prevent  
task to dispose of the toxic waste  
the history of Toxic waste storage  
in this country.

24-1

24-2

24-3

**Response to Comment No. 24-1**

The commentator's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

**Response to Comment No. 24-2**

The commentator's opposition to the management of foreign research reactor spent nuclear fuel in the United States is noted. Sections 2.3, 2.5 and 4.4 of the EIS describe other alternatives under consideration for implementation of the proposed policy.

**Response to Comment No. 24-3**

The commentator's concern regarding the government's ability to perform the tasks necessary to dispose of the foreign research reactor spent nuclear fuel is noted. As discussed in Section 4 of the EIS, foreign and domestic spent nuclear fuel have been transported in the United States for over four decades without a single radiological incident. As discussed in Section 4 and Appendix F of the EIS, foreign research reactor spent nuclear fuel could be safely stored at one or more of the candidate management sites pending ultimate disposition.

Correspondence to:

Department, EM-37  
 NV  
 SW  
 0001

**COMMENTOR No. 24: Micallef, Paul****RESPONSE TO COMMENT  
COMMENTOR No. 24: Micallef, Paul**

**Written Comments on the Draft Environmental Impact Statement  
on a Proposed Nuclear Weapons Nonproliferation Policy  
Concerning Foreign Research Reactor Spent Nuclear Fuel**

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Paul Micallef Phone: 510 922-1766Title and Organization: 431 LA VISTA RD.Address: WALNUT CREEK State: CA Zip: 94518**... COMMENTS ...**

I am joined with my wife in absolutely opposing the importation, transportation, and storage of nuclear waste in and through Concord, Calif.  
We do not approve of the United States taking the burden of storing fuel for 28 foreign countries.  
In terms of government agency responsibility,  
I have no trust in your ability to perform the necessary tasks to dispose of this type waste  
with safety. The history of Topic waste storage is a failure in this country.

24.1

24.2

24.3

**Response to Comment No. 24-1**

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

**Response to Comment No. 24-2**

The commentor's opposition to the management of foreign research reactor spent nuclear fuel in the United States is noted. Sections 2.3, 2.5 and 4.4 of the EIS describe other alternatives under consideration for implementation of the proposed policy.

**Response to Comment No. 24-3**

The commentor's concern regarding the government's ability to perform the tasks necessary to dispose of the foreign research reactor spent nuclear fuel is noted. As discussed in Section 4 of the EIS, foreign and domestic spent nuclear fuel have been transported in the United States for over four decades without a single radiological incident. As discussed in Section 4 and Appendix F of the EIS, foreign research reactor spent nuclear fuel could be safely stored at one or more of the candidate management sites pending ultimate disposition.

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head  
 Office of Spent Fuel Management, EM-37  
 U.S. Department of Energy  
 1000 Independence Avenue, SW  
 Washington, DC 20585-0001

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**RESPONSE TO COMMENT  
COMMENTOR No. 26: LUCAS, STAN**

*Response to Comment No. 26-1*

If accepted into the United States, the foreign research reactor spent nuclear fuel would be stored at one or more of the five candidate management sites discussed in Section 2.6.5 of the EIS. No "waste plant" would be sited in the Concord, California area.

26-1

Drop it  
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positions  
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257

252

P.W.

Q


**COMMENTOR No. 27: SMITH, SUSAN****RESPONSE TO COMMENT  
COMMENTOR No. 27: SMITH, SUSAN****Written Comments on the Draft Environmental Impact Statement  
on a Proposed Nuclear Weapons Nonproliferation Policy  
Concerning Foreign Research Reactor Spent Nuclear Fuel**

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Susan Smith Phone: \_\_\_\_\_  
 Title and Organization: Individual  
 Address: 87 Ruth Dr  
 City: Pleasant Hill State: CA Zip: 94522

**\*\*\* COMMENTS \*\*\***

I oppose your plan to ship spent nuclear fuel through our community. Plutonium is one of the most dangerous substances known to man kind. I do not place it a popularized commodity now. There is no 100% safe way to contain it. I have a 2 year old child. We already the weapons situation. I feel your plan is immoral & extremely dangerous to our lives & healths.

**Response to Comment No. 27-1**

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through Concord NWS is noted. Health and safety were primary considerations during the evaluation of environmental effects for the proposed action and its management alternatives. Conservative estimates of radiological and non-radiological impacts show that risks to the population and workers are low (Sections 4.2.2 and 4.5 of the EIS).

27-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head  
 Office of Spent Fuel Management, EM-37  
 U.S. Department of Energy  
 1000 Independence Avenue, SW  
 Washington, DC 20585-0001

**COMMENTOR No. 28: ACE, CAROL A.****RESPONSE TO COMMENT  
COMMENTOR No. 28: ACE, CAROL A.****Written Comments on the Draft Environmental Impact Statement  
on a Proposed Nuclear Weapons Nonproliferation Policy  
Concerning Foreign Research Reactor Spent Nuclear Fuel**

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Carol Ace Phone: 676-6153  
 Title and Organization: Citizen of Concord  
 Address: 4506 Adams Dr  
 City: Concord State: Ca Zip: 94521

**\*\*\* COMMENTS \*\*\***

I am a citizen of Concord who  
 in Bishop Estelle's Civics class  
 went to the Concord Nuclear  
 Station.  
 I am concerned that Concord  
 Station may be considered to deposit  
 further nuclear waste. There must  
 be an area that is away from  
 civilization that is large enough  
 to deposit this waste.

**Response to Comment No. 28-1**

The commentator's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

If the foreign research reactor spent nuclear fuel is accepted into the United States (Management Alternatives 1 or 3), there would be no storage of this material at Concord NWS, or any other port. Under normal circumstances, it would remain at a port for only a few hours. In the event of a major disruption of ground transportation systems due to adverse weather, seismic activity, or other situation, DOE's goal is to minimize holding times at the ports and to provide safe transport of the spent nuclear fuel to its destination as quickly as possible.

**28-1**

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head  
 Office of Spent Fuel Management, EM-37  
 U.S. Department of Energy  
 1000 Independence Avenue, SW  
 Washington, DC 20585-0001

**RESPONSE TO COMMENT**  
**COMMENTOR No. 29: NAVMANN, MICHAEL**

**COMMENTOR No. 29: NAVMANN, MICHAEL**

**Written Comments on the Draft Environmental Impact Statement  
 on a Proposed Nuclear Weapons Nonproliferation Policy  
 Concerning Foreign Research Reactor Spent Nuclear Fuel**

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: MICHAEL NAVMANN Phone: 510 279-6277

Title and Organization: U.S. GOVERNMENT CAN  
 Address: P.O. BOX 27294  
 City: CHICAGO, IL 60654 State IL Zip 60654

**... COMMENTS ...**

I AM NOT CONFIDENT THAT  
THE U.S. GOVERNMENT CAN  
GUARANTEE RESIDENTS OF CONCERN  
THAT THIS IDEA IS 100% SAFE.  
I KNOW ABOUT VARIOUS OTHER  
PROJECTS THAT WERE FATAL  
DUE TO HUMAN ERROR AND/OR  
POSSIBLE PROBLEMS. THE STATE SIGHTLINE,  
PORT CHICAGO, RIVERGATE, AGCO,  
OKLAHOMA CITY. CALIFORNIA HAS NUMEROUS  
NATURAL DISASTERS, EARTHQUAKES, CIVIL UNREST, GEESES AND  
MAN MADE DISASTERS - TERRORISM.

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head  
 Office of Spent Fuel Management, EM-37  
 U.S. Department of Energy  
 1000 Independence Avenue, SW  
 Washington, DC 20585-0001

**Response to Comment No. 29-1**

Every activity carries some risk. Radiological and non-radiological risks analyzed in Section 4 of the EIS indicate that there would be no significant impact to either human health or the environment as a result of the proposed action and its management alternatives. Nuclear weapons proliferation also carries risks, and the purpose of the proposed action is to reduce those risks through a cooperative foreign policy.

**29-1**

**COMMENTOR No. 30: WILLIAMS, LES**

**Written Comments on the Draft Environmental Impact Statement  
on a Proposed Nuclear Weapons Nonproliferation Policy  
Concerning Foreign Research Reactor Spent Nuclear Fuel**

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: LES WILLIAMS Phone: \_\_\_\_\_  
 Title and Organization: 139 Monocleat Blvd #13  
 Address: Concord State: CA Zip: 94520  
 City:

\*\*\* COMMENTS \*\*\*

Stop All Nuclear  
Development  
No Storage in Concord  
No Transport

30-I

**Response to Comment No. 30-1**

The commentor's opposition to nuclear development, as well as to transport of foreign research reactor spent nuclear fuel through Concord NWS or to storage at Concord NWS, is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to Concord NWS, or to any port analyzed in the EIS is low.

If the foreign research reactor spent nuclear fuel is accepted into the United States (Management Alternatives 1 or 3), there would be no storage of this material at Concord NWS, or any other port. Under normal circumstances, it would remain at a port for only a few hours. In the event of a major disruption of ground transportation systems due to adverse weather, seismic activity, or other situation, DOE's goal is to minimize holding times at the ports and to provide safe transport of the spent nuclear fuel to its destination as quickly as possible.

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head  
 Office of Spent Fuel Management, EM-37  
 U.S. Department of Energy  
 1000 Independence Avenue, SW  
 Washington, DC 20585-0001

No. 31: ALIY-WMS, TRUMILLA**RESPONSE TO COMMENT  
COMMENTOR No. 31: ALIY-WMS, TRUMILLA**

The Draft Environmental Impact Statement  
Clear Weapons Nonproliferation Policy  
Research Reactor Spent Nuclear Fuel

Comments, please feel free to use this page and drop it off. Alternatively, you may mail your comments to the address listed below. Also, please provide us with your number for any follow-up information or any questions comments. This will also allow us to properly indicate the response document. Thank you.

Name: PRESIDENT MONUMENT OAKS  
Phone: INT BLVD. #13  
State: CA Zip: 94520

## \*\* COMMENTS \*\*

THAT NUCLEAR  
TION COMING  
SCOPED.

| 31-1 |

*Response to Comment 31-1*

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

Leave to:

EM-37

**RESPONSE TO COMMENT**  
**COMMENTOR No. 33: JAMERSON, JANET**

**COMMENTOR No. 33: JAMERSON, JANET**

Written Comments on the Draft Environmental Impact Statement  
 on a Proposed Nuclear Weapons Nonproliferation Policy  
 Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Janet Jamerson Phone: 676-85521  
 Title and Organization: Social Science 111 - Bob Maranberg  
 Address: 154 The Trees Dr  
 City: Concord State: CA Zip: 94528

... COMMENTS ...

Yes, I think Concord Naval Weapon Station may be able to handle the arms they have right now but I think they are not able to handle the foreign research reactor spent nuclear fuel that they are trying to ship in, without failure of some sort to our city

**Response to Comment 33-1**

As the port selection process described in Appendix D, Section D.1 of the EIS explains in detail, Concord NWS and the other nine ports all meet the criteria and hence are considered to be able to safely handle the foreign research reactor spent nuclear fuel. The experience used in the port selection process (Appendix D, Section D.1.9.1 of the EIS) evaluates the port's experience in handling containerized cargo, such as would be the case for any spent nuclear fuel shipments. Although the foreign research reactor spent nuclear fuel is radioactive material, the dose rates from the casks used to transport it would be low, so no special handling is required.

33-1

To Mail in Comments, Address Correspondence to:  
 Mr. Charles R. Head  
 Office of Spent Fuel Management, EM-37  
 U.S. Department of Energy  
 100 Independence Avenue, SW  
 Washington, DC 20585-0001

COMMENT  
ELLYSON, MARY

Arch reactors could be used to manufacture nuclear weapons. These reactors require a sophisticated chemical processing plant to remove the fissionable material from the nuclear fuel, and time and money to perform this task. This is a task that is supportive of weapons itself. The intent of the proposed program is to convert their reactors to the use of plutonium. This would be a poor target for conversion.

The HEU from spent nuclear fuel and convert it to plutonium. In fact, the physical security measures implemented (Section H of the EIS) make it a poor target for conversion.

**COMMENTOR No. 39: BROWN, RACHEL****RESPONSE TO COMMENT  
COMMENTOR No. 39: BROWN, RACHEL****Written Comments on the Draft Environmental Impact Statement  
on a Proposed Nuclear Weapons Nonproliferation Policy  
Concerning Foreign Research Reactor Spent Nuclear Fuel**

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Rachel Brown Phone: (202)324-3809  
 Title and Organization: Citizen  
 Address: 102 E. Howell St.  
 City: S. Atlanta, State GA Zip 30312

**\*\*\* COMMENTS \*\*\***

I do not approve of my tax dollars to work in high-level nuclear waste and plutonium weapons.  
This is lunacy!

**Response to Comment No. 39-I**

The commentor's opposition to acceptance and management of foreign research reactor spent nuclear fuel in the United States is noted. Sections 2.3, 2.5, and 4.4 of the EIS describe other alternatives under consideration.

**39-I**

To Mail in Comment, Address Correspondence to:  
 Mr. Charles R. Head  
 Office of Special Fuel Management, EM-37  
 U.S. Department of Energy  
 1000 Independence Avenue, SW  
 Washington, DC 20585-0001

**RESPONSE TO COMMENT  
COMMENTOR No. 39: BROWN, RACHEL (CONT'D.)**

**COMMENTOR No. 39: BROWN, RACHEL (CONT'D.)**

May, 24, 95

To whom it may concern:

I would like to start off by saying that I am disappointed that my comments could not be taken ~~39-1~~  
 (Cont'd.)  
 vernation at this hearing. I strongly disagree with and oppose the proposed of these Spent Fuel Shipments.  
 First, the risk of accidents is a major problem. If this waste is to come into the states for a period of ten years or longer, where is it all going to go? We are already having problems with the waste stored in the United States now. If we take in this waste we are just making our problems worse. What we are just making are problems worse. Everyone should keep their own WASTE!!!

Thank you

Rachel Brown

Rachel Brown  
602 E. Howell St.  
Seattle, WA, 98122

**Response to Comment No. 39-2**

Section 4 of the EIS evaluates the impacts of accident conditions that could result from the acceptance and management of foreign research reactor spent nuclear fuel in the United States. Accident conditions were considered for marine transportation, activities at ports of entry, ground transportation and at DOE management sites (Sections 4.2.1, 4.2.2, 4.2.3, and 4.2.4, respectively). The analyses determined that the risks to the environment and the health and safety of the workers and the public due to potential accidents were low.

For planning purposes, DOE has determined that its spent nuclear fuel, including foreign research reactor spent nuclear fuel, that is not otherwise dispositioned (e.g., chemically separated, with the high-level waste being converted into a vitrified glass for repository disposal), is authorized for disposal in a geologic repository. However, since the repository characterization program is in its early stages, the waste acceptance criteria for deposit of DOE's spent nuclear fuel have not been developed. Thus, a determination cannot be made at this time as to the requirements that must be met to allow placement of the foreign research reactor spent nuclear fuel in the repository. As a result, the analysis in the EIS for the time period beyond 40 years is qualitative rather than quantitative. The impacts due to ultimate disposition are discussed qualitatively in Section 4.2.7 of the EIS.

**SECTION 2.7: INDIVIDUALS**

**TO COMMENT**  
**TO: ZEPEDA, BARBARA**

the production of nuclear weapons. Section 1.1  
1, commercial, and educational applications for  
lized. The proposed action seeks to reduce  
by reduce the threat of nuclear terrorism (Section

**No. 41: MACARTHUR-PANGBORN, SALLY**

**RESPONSE TO COMMENT**  
**COMMENTOR No. 41: MACARTHUR-PANGBORN, SALLY**

site on the Draft Environmental Impact Statement  
 and Nuclear Weapons Nonproliferation Policy  
 Foreign Research Reactor Spent Nuclear Fuel

written comments, please feel free to use this page and drop it  
 when you leave. Alternatively, you may mail your comments to  
 us at the address listed below. Also, please provide us with your  
 case number for any follow-up information or any questions  
 or comments. This will also allow us to properly indicate the  
 the comment response document. Thank you.

206  
Line Person      Phone: 323-5980  
Facilitated  
Line E  
State Line Zip 0112-4421

\*\*\* COMMENTS \*\*\*

I sincerely feel better each time  
I include establishment of your desire  
change your priorities of trying  
to be the most part when  
Exercising of the other's represent  
able before the message arrived  
lets people to make a difference.  
The establishment (including) line down  
hard action - & best time of  
using to express himself,  
in his presence and necessary  
and do our good you and all of us  
must work for your work.  
Impediment to  
old boy's advocate around nation;  
we  
W. SW  
can  
I believe it works if people are  
What creates heroes is having people  
live and manipulate. The heroes get  
and they think they are correct by destroying

**Response to Comment No. 41-1**

The format adopted by DOE for the public hearings held on the draft EIS is fully in compliance with the requirements of NEPA implementing regulations and DOE's requirements for conducting such hearings. This public hearing format provides opportunity for increased interaction between DOE and the public, thus serving to facilitate communication. In the large majority of cases, this public hearing format has been well received by the public. During the hearings, the facilitator recorded the major comment themes on flip charts where the audience could see what was being recorded. In addition, notetakers in the audience were recording additional information to supplement the points captured by the facilitator. Nevertheless, for those people who wished to submit their comments as individuals, or who wished to ensure that their comments were received exactly as they stated them, DOE also encouraged and welcomed the submittal of written comments, either on forms distributed during the public hearings, or in any other written form the public chose to use. Considering all of the redundant mechanisms that were provided to allow comments to be submitted, DOE considers that tapes of the hearing themselves were not necessary.

41-1

**SECTION 2.7: INDIVIDUALS**

JENNIFER

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## SECTION 2.7: INDIVIDUALS

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SECTION 2.7: INDIVIDUALS

***RESPONSE TO COMMENT  
No. 43: ROGERSON, PETE (CONT'D.)***

***# No. 43-4***

commentor to the proposed policy is noted. The United States U from civilian commerce worldwide and to safely manage all

***# No. 43-5***

ion about generally inadequate nuclear storage and disposal analysis in Section 4.2.4 of the EIS demonstrates that the risk storage of foreign research reactor spent nuclear fuel at the DOE be low.

disposition of spent nuclear fuel are discussed qualitatively in DOE is currently evaluating the feasibility of construction of a mountain, NV. In the meantime, support for U.S. nuclear weapons requires DOE and the Department of State to consider other means than research reactor spent nuclear fuel (Section 1.1. of the EIS) and 4.2.7 of the EIS, if a geologic repository is not prepared to research reactor spent nuclear fuel or its resultant stable waste formsical separation or other processing technology) DOE would material in existing facilities at the DOE management site(s).

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***RESPONSE TO COMMENT***  
***COMMENTOR No. 47: BERGER, DAVE***

*e to Comment 47-1*

research reactors are used for research, medical, commercial, and educational purposes (Section 1.1 of the EIS) not for the manufacture of conventional or nuclear weapons. An objective of the proposed policy is to encourage the use of LEU in foreign reactors (Section 1.2 of the EIS). Because of the peaceful applications and benefits resulting from operation of research reactors, foreign nations are not likely to cease and desist from construction of such reactors. In addition, the U.S. accues significant isotopes from the operation of foreign research reactors - including Moly-99 and other isotopes.

Proliferation of nuclear weapons is a vital policy goal of the United States (Section 2 EIS). Although the treatment of hazardous materials in foreign nations is an environmental concern, it is outside of the scope of this EIS.

⑦ **COMMENT**  
8: **BERGER, DAVE**

ential risks resulting from the management  
assumptions and found to be low (Section  
gement Alternative 1 or 3 to the proposed  
in for the United States, it would promote  
], and thereby reduce the threat of nuclear

foreign research reactor spent nuclear fuel  
At the present time, many foreign research  
on of their spent nuclear fuel (Section 1.1 of  
is to remove as much U.S.-origin HEU as  
give foreign research reactor operators time  
ls and to make arrangements for disposition  
of the EIS).

SECTION 2.7: INDIVIDUALS

**RESPONSE TO COMMENT  
OR No. 49: KLAUSMAN, STEVE**

**49-1**

on to acceptance of foreign research reactor spent nuclear fuel Sections 2.3, 2.5, and 4.4 of the EIS describe other alternatives

we material is an important concern. Because spent nuclear reactors is radioactive, it is transported in casks which shield niful levels of radioactivity. In addition, the spent nuclear fuel is constructed to withstand severe stress, such as accidents and ut releasing their contents. Section 2.6.2 of the EIS describes used to transport spent nuclear fuel from foreign research ly managing spent nuclear fuel are described in Section 2.6.5

**COMMENTOR No. 50: GROVER, MIKE**

**RESPONSE TO COMMENT**  
**COMMENTOR No. 50: GROVER, MIKE**

**Written Comments on the Draft Environmental Impact Statement  
 on a Proposed Nuclear Weapons Nonproliferation Policy  
 Concerning Foreign Research Reactor Spent Nuclear Fuel**

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Mike Grover Phone: 233-1139  
 Title and Organization: \_\_\_\_\_  
 Address: 2548 SE Arvey State OR Zip 97214  
 City: Salem

\*\*\* COMMENTS \*\*\*

We NEED to stop irradiating the poison (comm) which makes people sick if they live in the present plant. Irradiated fuel is not a good idea. NPI C7B has little to no incentive to do so. It is a radioactive cleanup of Maxey Flats, Beatty, Springfield, Samona, and Rocky Flats.

50-1

Creation of Nuke Shuttles = destruction of Biology.  
 Live fees or die is nothing if you fine.

50-2

50-1  
 (Cont'd.)

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head  
 Office of Spent Fuel Management, EIM-37  
 U.S. Department of Energy  
 1000 Independence Avenue, SW  
 Washington, DC 20585-0001

This could have been  
 by the size of the  
 nuclear hardware

**Response to Comment No. 50-1**

The commentor's position on these matters is noted. The EIS has discussed in detail the potential impacts associated with implementation of the proposed action and any of its management alternatives. As discussed in Section 4 of the EIS, the risks associated with implementation of the proposed action to human health or the environment would be low.

**Response to Comment No. 50-2**

Waste management activities at facilities such as Maxey Flats, Beatty, Hanford, Savannah River, and Rocky Flats are outside the scope of this EIS (Section 1.3 of the EIS).

**No. 51: ROBINSON, Bob**

**RESPONSE TO COMMENT  
COMMENTOR No. 51: ROBINSON, Bob**

**WT OF ENERGY  
ON TRANSPORT  
WASTE**

25, 1995

ion in particular has been proposed as the nuclear waste from other countries who are prone to the proliferation and left to dispose of these waste materials on

me, attempts are being made to transport [REDACTED] through the Port of Portland and to [REDACTED] to a storage area. This is [REDACTED] struggle to protect our citizens and unnecessary transport of volatile and [REDACTED]

**51-1**

have consistently opposed any transfer or [REDACTED] in or through Oregon and the Pacific [REDACTED] or the world to see and enjoy the beauty [REDACTED] continue to protect this way of life. It [REDACTED] or the Department of Energy to give this [REDACTED]

**51-2**

truly dedicated to a fair and impartial [REDACTED] sic common sense analysis of the issue [REDACTED] as a deposit site for Nuclear Wastes. The [REDACTED] sent to the Columbia River and the [REDACTED] is ludicrous on its face. Your assumption [REDACTED] at Hanford so that's where we'll dump it [REDACTED] because one has a headache doesn't mean [REDACTED]

**51-3**

asonable and equitable alternative. Stop [REDACTED] and the money allocated for Nuclear Waste [REDACTED] reasonable storage facilities research. [REDACTED]

it. This is the answer to resolve this [REDACTED] y.

Sincerely,

*Bob Robinson*

BOB ROBINSON  
2226 S.E. 35th Place  
Portland, Oregon 97214  
503-235-5498

**Response to Comment No. 51-1**

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Portland is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Portland, or to any of the ports analyzed in the EIS, is low.

DOE would like to point out that the foreign research reactor spent nuclear fuel is neither volatile nor unstable. The spent nuclear fuel that the proposed policy deals with is a metal which contains enriched uranium clad with either aluminum or stainless steel. This type of fuel is very stable. Section 2.6.1 of the EIS presents a detailed description of the foreign research reactor spent nuclear fuel.

**Response to Comment No. 51-2**

The commentor's opposition to the proposed action, including storage in the States of Washington and Oregon is noted. As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site. The State of Oregon was not considered for storage of spent nuclear fuel.

**Response to Comment No. 51-3**

Under the No Action Alternative, as described in Section 2.5 of the EIS, the United States would not manage spent nuclear fuel from foreign research reactors, nor provide assistance or incentives for overseas management of such spent nuclear fuel. Based on the undesirable impact this alternative would have on U.S. nuclear weapons nonproliferation policy, the No Action Alternative would not be considered the most viable option for managing foreign research reactor spent nuclear fuel.

ENT  
MS, LYNN

uring the scoping process in  
scoping meetings was solicited  
and was responded to in the  
1 policy on spent nuclear fuel  
arings on the proposed policy  
er document — the draft EIS.  
d in the Implementation Plan,  
dered in the preparation of the  
gs on the draft EIS, and those  
ent period, were considered.

lid initiative that was intended  
aceful nuclear technology in  
hey would not pursue nuclear  
ram was to encourage research  
cal, agricultural, and industrial  
1.1 of the EIS).

very similar to Management  
preference for Management  
of the EIS.

posed action is to support U.S.  
uce, and eventually eliminate,  
n civil programs worldwide.  
ons. Section 1.1 of the EIS  
ural applications for foreign

ed States are outside the scope  
commercial power and play no  
conomic impacts resulting from

**COMMENTOR No. 53: SIMMS, LYNN (CONT'D.)****RESPONSE TO COMMENT  
COMMENTOR No. 53: SIMMS, LYNN (CONT'D.)**

Every single technically correct decision may be made as you implement these projects. But you are none the less, still on the wrong path. And it should be obvious, even to you, that the military industrial complex has no room for second opinions and that if it has its way, even the Department of Energy will be eliminated and the military budgets will increase and the clean up funds and regulations will be lessened.

Listen to us and take out your erasers and wipe out the Port of Portland from your list of targeted ports. Because the people of Portland never will participate in, aside, condone, or approve of this continuing nuclear madness.

***Response to Comment No. 53-5***

The commentor's opinions related to the military industrial complex and the future of DOE are outside the scope of the EIS.

***Response to Comment No. 53-6***

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Portland is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Portland or to any of the ports analyzed in the EIS, is low.

**53-5****53-6**

## SECTION 2.7: INDIVIDUALS

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**COMMENTOR No. 55: FERGUSON, KEN**

**RESPONSE TO COMMENT**  
**COMMENTOR No. 55: FERGUSON, KEN**

**Written Comments on the Draft Environmental Impact Statement  
on a Proposed Nuclear Weapons Nonproliferation Policy  
Concerning Foreign Research Reactor Spent Nuclear Fuel**

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: KEN FERGUSON Phone: (509) 497-9131  
Title and Organization: GREEN PEACE Phone: (509) 233-1159  
Address: 2021 SW 6TH  
City: POTLAND State: Oregon Zip: 97201

... COMMENTS ...

NO CORRECTION For THE DRAFT SNS SNF  
Program Hearing August 6th(?) 1994  
Volume 3, Commenter Response Document  
RECOMMENDED THAT I STATE THAT LEADS WOULD  
BE A GOOD LOCATION TO OPERATE SNF  
REPROCESS IT AND SUPPORT PREVIEW FARM  
DISTRIBUTION OF REACTOR FUEL.  
MY COMMENTER WANTS TO EXPRESS  
BE AN OPPOSITION TO RECEIVE THIS  
FUEL FOR THIS OR ANY OTHER USE

**Response to Comment No. 55-1**

55-1

The commentor's opposition to acceptance of spent nuclear fuel from foreign research reactors is noted. Sections 2.3, 2.5, and 4.4 of the EIS describe other alternatives under consideration. The commentor's claim that Volume 3 of the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Final Environmental Impact Statement misquotes the commentor is also noted.

To Mail in Comments, Address Correspondence to:  
Mr. Charles R. Head  
Office of Spent Fuel Management, EM-37  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-0001.

CNR



T KEN (CONT'D.)

es some risk. However, as  
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om transportation of spent  
low (Section 4 of the EIS).  
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**TOR No. 55: FERGUSON, KEN (CONT'D.)**

**RESPONSE TO COMMENT  
COMMENTOR No. 55: FERGUSON, KEN (CONT'D.)**



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Inquiries call toll free 800-228-9290

***Response to Comment No. 55-4***

The impacts of ultimate disposition of the foreign research reactor spent nuclear fuel are discussed qualitatively in Section 4.2.7 of the EIS. A detailed, quantitative discussion of these impacts would have to be the subject of future NEPA documentation.

The amount of spent nuclear fuel involved in this EIS is presented in Section 2.2.1.3. It is equal to less than one percent of the total mass of heavy metal that DOE currently manages, and approximately ten percent of the volume.

***Response to Comment No. 55-5***

Chemical separation is being considered as Implementation Alternative 6 to Management Alternative 1 and as part of Management Alternative 3 in this EIS. DOE takes note of the commentor's opposition to the chemical separation alternatives, which are discussed in Section 2.2.2.6, 2.4, 4.36 and 4.5 of the EIS.

55-5

## FOR No. 55: FERGUSON, KEN (Cont'd.)

RESPONSE TO COMMENT  
COMMENTOR No. 55: FERGUSON, KEN (Cont'd.)

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(Cont'd.)

## COMMENTOR No. 55: FERGUSON, KEN (Cont'd.)

RESPONSE TO COMMENT  
COMMENTOR No. 55: FERGUSON, KEN (Cont'd.)

(4)

MAY I REMIND YOU THAT THESE ARE WASTES NOT EXTRACTED TODAY FROM THOUSANDS OF YEARS AND IT STAYS AND APPARENTLY THAT THIS VITRIOLIC EXTRACT IS NOT FUNCTIONING AS IT SHOULD. (WHAT I MEAN BY THIS IS NOT FUNCTIONING ACCORDING TO DESIGN STATEMENT) AND THIS PLUTONIUM IS CAPTURED EXTRAPOLATION FACILITY (PLEX) LOCATED AND HANDLED AS BEING WHETHER ILLUMINATES THE DOSE PROPOSED FIRE DISPOSITION OF THESE FEES.

55.5  
(Cont'd.)

For reservations call toll free 800-228-9290

**COMMENTOR No. 55: FERGUSON, KEN (CONT'D.)****RESPONSE TO COMMENT  
COMMENTOR No. 55: FERGUSON, KEN (CONT'D.)**

⑤ In conclusion I would like to note that off certain sources that work with wind energy and on conservation and efficiency can provide off-shore wind energy with certain sources as long as the sun shines and the wind blows. The most power dollars that are burned into EIS's (over 100 hours) statement of these markets and future generation markets only creates a lack of market for future generations and therefore certain energy alternatives from being developed.

***Response to Comment No. 55-6***

Consideration of alternative energy sources is outside the scope of this EIS. However, it is important to note that as part of its mission, DOE currently has on-going programs that are seeking to develop and promote use of these alternative energy sources, such as solar and wind.

55-6

SECTION 2.7: INDIVIDUALS

**RESPONSE TO COMMENT  
COMMENTOR No. 55: FERGUSON, KEN (CONT'D.)**

***e to Comment No. 55-7***

foreign research reactor operators will soon run out of storage space or face safety  
dry issues due to the presence of spent nuclear fuel at their facility (Section 1.1  
). The intent of the proposed policy is to remove as much U.S.-origin HEU as  
from civil programs worldwide and give foreign research reactor operators time  
their reactors to the use of LEU fuels and to make arrangements for disposition  
EU spent nuclear fuel (Section 1.2 of the EIS).

E L.

uclear weapons also undesirable  
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**SECTION 2.7: INDIVIDUALS**

**IT JCE L. (CONT'D.)**

consideration. As discussed in  
would have no direct impact  
Action Alternative does not  
may have adverse diplomatic

**RESPONSE TO COMMENT  
COMMENTOR No. 64: CARDINALE, GEORGE**

*re to Comment No. 64-1*

of the United States Congress have been provided with copies of the draft EIS.  
ce of spent nuclear fuel from foreign research reactors under Management  
ye 1 to the proposed action would increase DOE's inventory of heavy metal  
urium) less than one percent by mass and about ten percent by volume (Section  
f the EIS).

**COMMENTOR No. 65: HARRILL, WILLIAM**

**RESPONSE TO COMMENT**  
**COMMENTOR No. 65: HARRILL, WILLIAM**

**Written Comments on the Draft Environmental Impact Statement  
on a Proposed Nuclear Weapons Nonproliferation Policy  
Concerning Foreign Research Reactor Spent Nuclear Fuel**

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: William Harrill Phone: (804) 346-5242  
Title and Organization: \_\_\_\_\_  
Address: 920 Bi-Mon-Dr  
City: La Plata State: MD Zip: 20646

\*\*\* COMMENTS \*\*\*

Enclosed is a statement on red mercury. Please note  
Comments on mercury containing stock do not necessarily reflect the views of the

**Response to Comment No. 65-1**

Commerce in red mercury is outside the scope of this EIS (Section 1.4 of the EIS). The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly-enriched (weapons-grade) uranium in civil programs worldwide (Section 1.2 of the EIS).

65-1

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head  
Office of Spent Fuel Management, EM-37  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-0001

**COMMENTOR No. 66: CHUBB, WALSTON****RESPONSE TO COMMENT  
COMMENTOR No. 66: CHUBB, WALSTON**

Mr. Charles Head, Program Manager  
Office of Spent Nuclear Fuel Management  
Department of Energy 20585

Dear Mr Head,

The dollar is falling in value relative to the yen and the mark. The national debt is rising above \$45,000 per household. If we borrow more money on signature notes, the dollar will fall some more. We're broke because back in 1974 we chose to be non-competitive in world trade. We could have chosen to be the lowest cost producer of goods. Instead, we created the N.R.C. and ordered it to insure that the electricity made in nuclear power plants was at least as costly as the electricity made in coal-fired plants. The Chinese aren't that stupid; and they also have plenty of coal.

Bankrupt countries must look for ways to make and save more money. They must adopt a lower standard of living, work harder, and try to become the lowest cost producer of goods.

Unless you wish to see the U.S. wallowing in debt, you must require that all spent nuclear fuel be stored and reprocessed in the U.S. Either the U.S. will plan to reprocess all of its spent nuclear fuel and dispose of its excess plutonium in MOX, or the U.S. must plan to put up our excess plutonium as collateral for loans on an increasing national debt. By promoting and signing an extension of the nuclear non-proliferation treaty, the U.S. has tacitly agreed to dispose of its excess plutonium in either domestic or foreign MOX. Hiding it won't convince the world of our peaceful intentions.

Clearly, the U.S. must plan to build facilities for reprocessing all types of spent nuclear fuel. Our creditors aren't likely to take more depreciating signature notes as payment for reprocessing our spent fuel into plutonium that we refuse to use. The U.S. cannot prosper in total isolation from the rest of the world.

Sincerely,

*Walter Chubb*  
Walter Chubb  
3450 MacArthur Drive  
Murrysville, PA 15668  
412-227-8592

May 17, 1995

**Response to Comment No. 66-1**

The commentor's preference for the chemical separation of the foreign research reactor spent nuclear fuel is noted. However, please note that the scope of this EIS does not include power generation, either in the United States or abroad.

**Response to Comment No. 66-2**

This EIS covers the inventory of foreign research reactor spent nuclear fuel listed in Tables 2-1 and 2-2. The commentor's support for construction of facilities for reprocessing other types of spent nuclear fuel is noted. The reprocessing of other spent nuclear fuel is outside the scope of this EIS. Similarly, the disposition of excess plutonium is to be discussed in the Programmatic Environmental Impact Statement for Storage and Disposition of Weapons-Usable Fissile Materials (Section 1.5 of the EIS).

The Treaty on the Non-Proliferation of Nuclear Weapons does not discuss methods for disposal of plutonium. The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide (Section 1.2 of the EIS).

66-1  
(Conf'd.)

66-2

cc NEI  
NN

## SECTION 2.7: INDIVIDUALS

**DAVID**

ement a policy which  
d 1.2 of the EIS). The  
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SECTION 2.7: INDIVIDUALS

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**SECTION 2.7: INDIVIDUALS**

**ONSE TO COMMENT  
No. 73: VANHORN, LAURU**

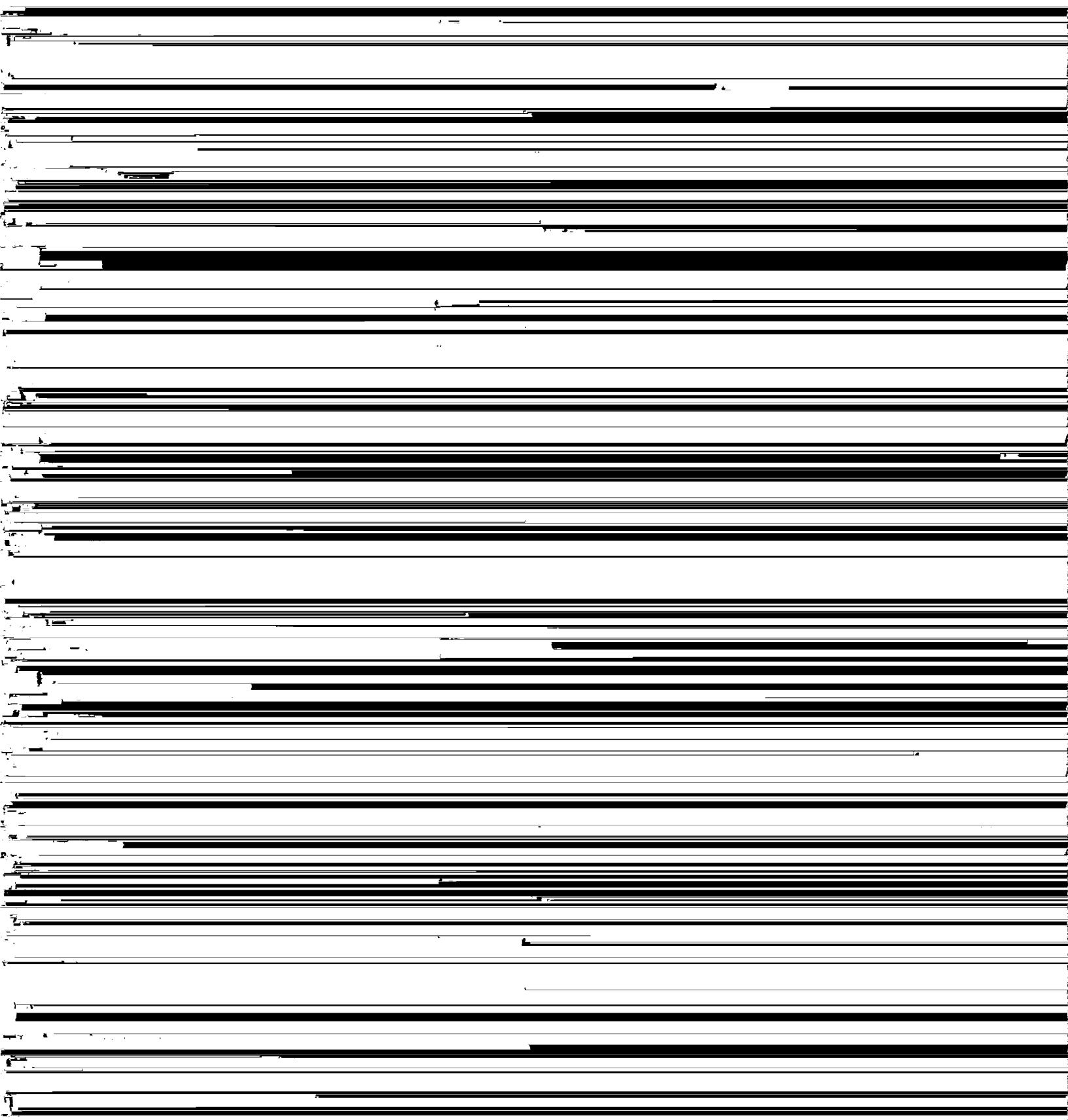
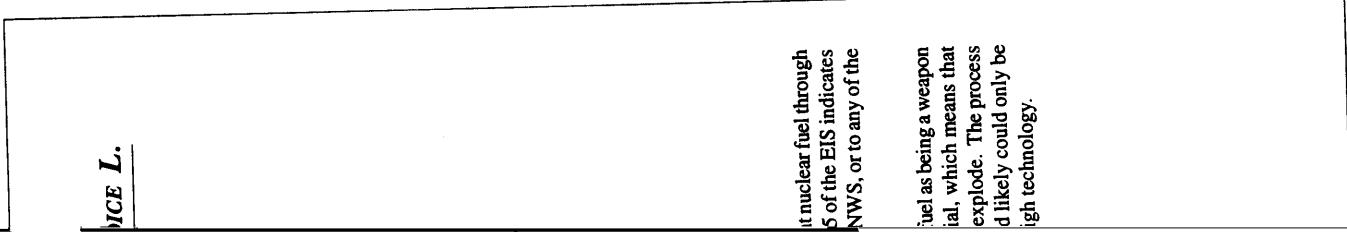
73-1

ring foreign research reactor spent nuclear fuel through  
er, analysis in Sections 4.2.2 and 4.5 of the EIS indicates  
ing spent nuclear fuel to Concord NWS, or to any of the

ile radius of the Concord NWS was considered when  
cident-free transport and the range of hypothetical port  
to be low. Appendix D, Section D.5 of the EIS provides  
hquakes were not analyzed separately in the EIS because  
lt in greater damage to a transportation cask than that  
subsequent fire. Rather, the consequences from the worst  
reign research reactor spent nuclear fuel transportation  
of what initiated them. An earthquake could be the initiator  
and thus affect the probability of such accidents; however,  
iced ship and road accidents is small compared to other

es not have the facilities required to safely manage the  
nuclear fuel].

NICE L.



it nuclear fuel through  
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uel as being a weapon  
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igh technology.

SECTION 2.7: INDIVIDUALS

COMMENT  
SEWELSON, BESS

foreign research reactor spent nuclear  
material effects expected during transport  
of the material can be found in Section 4.2 of the

**No. 76: DEBELLIS, Tony B.****RESPONSE TO COMMENT  
COMMENTOR No. 76: DEBELLIS, Tony B.****Environmental Impact Statement  
on Reactor Spent Nuclear Fuel  
Nonproliferation Policy**

Please feel free to use this page and drop it in the mail. Alternatively, you may mail your comments to the address below. Also, please provide us with your any follow-up information or any questions. This will also allow us to properly indicate the response document. Thank you.

Phone: 50 837 1086State A Zip 41524

MENTS \*\*\*  
terrible concern || 76-1

is great risk  
industry || 76-2

is a terrible  
with spent fuel  
If operators store  
used || 76-3

**Response to Comment No. 76-1**

DOE considers that implementation of a policy for management of foreign research reactor spent nuclear fuel in a manner that leads to the reduction and eventual elimination of the use of highly enriched (weapons grade) uranium in civil programs worldwide is in the best interests of the United States.

**Response to Comment No. 76-2**

Radiological and non-radiological health risks at candidate ports were evaluated (Section 4.2.2 of the EIS) and found to be very low for normal operations and in the case of accidents.

**Response to Comment No. 76-3**

Foreign research reactors are not used for generation of power. Research, medical, commercial, and educational applications of foreign research reactors are described in Section 1.1 of the EIS. As discussed in Section 1.2 of the EIS, many of the foreign research reactor operators are not currently able to store their spent nuclear fuel. Thus, the intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS). Nevertheless, the commentor's preference for the No Action Alternative (Section 2.5 of the EIS) is noted.

**SECTION 2.7: INDIVIDUALS**

**LENT**  
**VIN, WILLIAM**

reactor spent nuclear fuel through  
port selection criteria successfully  
actor spent nuclear fuel. The EIS  
d by the port selection process,  
o either the port personnel or the  
EIS).

**COMMENTOR No. 80: GLENN, WILLIAM (CONT'D.)**

**RESPONSE TO COMMENT  
COMMENTOR No. 80: GLENN, WILLIAM (CONT'D.)**

I am already disgusted by the  
fact that radiation is making a Hartford  
I feel you don't care about  
and the quality of life for my children  
and their children.

*80-1  
(Cont'd)*

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Annually  
William E. Glenn

P.S. Even if it were deemed safe  
I'm against it. Categorically against it.  
Don't consider Portland as a port.

**COMMENTOR No. 86: SCRATTISH, APRIL****RESPONSE TO COMMENT  
COMMENTOR No. 86: SCRATTISH, APRIL*****Response to Comment No. 86-1***

Charles Head  
Program Manager  
Office of Spent Nuclear  
Fuel Management (EM-37)  
U.S. Dept. of Energy  
1000 Ind. Ave. S.W.  
Washington, D.C. 20588

May 24, 1995

April Scrattish  
1418 So. Mildred #1306  
Tacoma, WA 98465

Mr. Charles Head:

I am a Biology student at Tacoma Community College. I am writing in regard to the articles I have recently read in the Tacoma News Tribune (May 13 and 16, 1995) concerning the Port of Tacoma as a proposed sight for the storage of nuclear fuel elements.

I have spoken with Nick Shultz, Communications Manager at the Port of Tacoma, and he informed me of a few of the aspects of this course of action. According to the U.S. Department of Energy, the likelihood of any considerable danger resulting from these shipments is, in all probability, very low. However, I was also told that if an accident were to occur and one of the protective casks were to explode or otherwise be exposed in any certain manner, there would be soil contamination, not to mention a great amount of peril to the health and safety of humanity. I was told that any affected soil would then have to be moved away from the human population. I have but one question: Why? Why would we take potentially dangerous materials and place them in the midst of an extremely populous area, where there is even a minute possibility of such peril taking place? Why would we endanger ourselves in this manner? As I mentioned before, if soil is contaminated, it will have to be moved away from humans. So why don't we just place the nuclear elements in an area where there is no danger in the first place?

Thank you for allowing me to voice my opinion. I hope that, although I am only one lone voice, I hope that I will still be taken seriously.

Sincerely,  
*April Scrattish*  
April Scrattish

If the foreign research reactor spent nuclear fuel is accepted into the United States there would be no storage of this material in the Port of Tacoma, or any other port. Under normal circumstances, it would remain at a port for only a few hours. In the event of a major disruption of ground transportation systems due to adverse weather, seismic activity, or other situation, DOE's goal is to minimize holding times at the ports and to provide safe transport of the spent nuclear fuel to its destination as quickly as possible.

The foreign research reactor spent nuclear fuel cannot explode, either in a transportation cask, or elsewhere. The worst accident that was considered possible is an accident where the ship carrying the foreign research reactor spent nuclear fuel collides with a petroleum tanker. In this case the cask was assumed to be damaged in the collision, then be immersed in the fire that resulted from the collision. In the unlikely event of a severe accident, the analysis performed for the EIS indicates that some radioactive material could be released from the cask and distributed into the environment. However, the analyses in Section 4.2.2.3 and Appendix D, Section D.5 of the EIS determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident. Close to the accident, near the cask would likely require some cleanup, but the overall impact on the water and air quality in the port would be very small.

***Response to Comment No. 86-2***

Spent nuclear fuel from foreign research reactors will not explode, but spent nuclear fuel containing HEU could be used to construct nuclear weapons. The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide. Risks to the general population and workers during transportation of spent nuclear fuel from foreign research reactors were found to be low for both normal operations and severe accidents (Section 4.2.3 of the EIS).

***Response to Comment No. 86-3***

As discussed in Section 4.2.2 of the EIS, the likelihood of an accident severe enough to cause the release of radioactive material from a spent nuclear fuel transportation cask is low. Even in the case of a very severe accident, the analyses in Section 4.2.2.3 and Appendix D, Section D.5 of the EIS determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident. Routine shipping, and handling of casks would not cause soil contamination.

While risks can be minimized, every activity carries some risk (Section 4.10.3 of the EIS). Management sites proposed for spent nuclear fuel from foreign research reactors are in remote locations (Sections 2.6.5 and 3.3 of the EIS).

**COMMENTOR No. 87: MILLER, JOYCE**

**RESPONSE TO COMMENT  
COMMENTOR No. 87: MILLER, JOYCE**

May 23, 1995

Dear Sir,

I'm against any form  
of nuclear waste rods or waste  
being sent to California,  
or being sent to Concord Naval Base! Or  
anyplace in California.  
Send it to Washington D.C.  
and you keep it in your back  
yard!

Thank you.  
Joyce Miller

*[Signature]  
Joyce Miller  
Concord, CA 94520*

**Response to Comment No. 87-1**

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS or elsewhere in California is noted. However, analysis in Sections 4.2, 2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low. It should be noted that the foreign research reactor spent nuclear fuel would only pass through Concord NWS and the State of California on its way to a DOE management site.

The Washington D.C. area does not have the facilities or experience required to manage the spent nuclear fuel.

**87-1**

**COMMENTOR No. 88: FOSTER, GINNY**

**RESPONSE TO COMMENT**  
**COMMENTOR No. 88: FOSTER, GINNY**

**Written Comments on the Draft Environmental Impact Statement  
 on a Proposed Nuclear Weapons Nonproliferation Policy  
 Concerning Foreign Research Reactor Spent Nuclear Fuel**

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Ginny Foster Phone: 223-0261  
 Title and Organization: Citizen  
 Address: 2600 New Hampshire #200  
 City: Bethesda State: MD Zip: 20216

\*\*\* COMMENTS \*\*\*

Do not store nor transport spent nuclear fuel waste here. We already have enough plutonium to make thousands of weapons grade plutonium in the U.S.

88-1

*Response to Comment No. 88-1*

The commentor's opposition to the acceptance and management of foreign research reactor spent nuclear fuel in the United States is noted. Management of foreign research reactor spent nuclear fuel in the United States is considered under Management Alternatives 1 and 3 (Sections 2.2 and 2.4 of the EIS). Sections 2.3, 2.5, and 4.4 of the EIS describe other alternatives under consideration.

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head  
 Office of Spent Fuel Management, EM-37  
 U.S. Department of Energy  
 1000 Independence Avenue, SW  
 Washington, DC 20585-0001

SECTION 2.7: INDIVIDUALS

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## SECTION 2.7: INDIVIDUALS

(*Cont'd.*)

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**RESPONSE TO COMMENT**  
**# No. 90: PATRICK, DIANA L.**

**90-1**

were held on the draft EIS in the locations determined to be affected by the EIS alternatives, specifically in the ports of management sites. In addition to accepting comments from the public, written comments were also welcomed and encouraged. Actions have provided ample opportunity for the public to provide input. DOE considers that if a foreign research reactor spent nuclear fuel is transported to the United States, there is adequate regulatory and emergency preparedness to ensure its safe acceptance and transportation to the reactor site. As discussed in Section 2.7.1 of the EIS, Federal funding to governments is being provided for maintaining emergency response plans under which DOE will provide planning, training, and assessment assistance. Under these plans, DOE will provide assistance to the State, Tribal, and local agencies involved

in security, and coordination of DOE with local emergency management agencies will be involved with the acceptance and transportation of spent nuclear fuel. The preparation of the Transportation Plan prior to any individual spent nuclear fuel shipment and associated emergency response plan will be coordinated with local officials. The general provisions of the Transportation Plan H which was added to the final EIS in response to public comment were found to be low.

**90-2**

logical risks to human health and the environment were prepared for in the EIS. Section 4 of the EIS describes the potential effects of the proposed actions. Appendices C through F provide supporting technical detail related to the potential effects of the proposed actions, transport, and interim storage of foreign material fuel.

**90-3**

agencies like DOE prepare a detailed EIS on the effects of the proposed actions. The EIS describes the potential effects of the proposed actions and provides an opportunity for the public to comment on the proposed actions. Appendix G provides a summary of the proposed actions and their potential effects. The decision whether to implement the proposed actions will be made by the agency that prepared the EIS, not by the agency that prepared the EIS.

## SECTION 2.7: INDIVIDUALS

**ONSE TO COMMENT  
No. 90: PATRICK, DIANA L.**

1-4

is discussed in Sections 2.3 and 4.4.1 of the EIS, is the search reactor spent nuclear fuel into the United States, where the spent nuclear fuel would be stored; just that it . Thus, if the comment is referring to an isolated island :commentor's alternative is covered under Management

isolated island that is part of the territory of the United the foreign research reactor spent nuclear fuel would states and this subject is covered under management en inserted into Section 2.10 of the EIS to explain why

1-5

ssage from San Francisco Bay to Concord NWS were election process. The passage meets the qualitative rable Transit From Open Ocean) for the port selection he EIS).

which a ship carrying a spent nuclear fuel transportation another ship, severe enough to breach the transportation fire resulting from the collision (Section 4.2.2.3 of the me as the worst conditions that might be expected to , carrying a spent nuclear fuel cask with a petroleum

ach the temperature required to melt foreign research degrees Kelvin, or 1,160 degrees Fahrenheit). Appendix ns a detailed discussion of accident probabilities and and Section D.5.4 presents the results of the analysis.

1-6

arine traffic (present or future) was not considered in ith the shipment of foreign research reactor spent nuclear up mishaps is not proportional to the amount of ship low, and even when heavy, is normally a small number reasing the volume does not significantly increase the er, the number of ship mishaps is associated with s from the port to the open ocean or a large bay (port

## SECTION 2.7: INDIVIDUALS

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K, DIANA L.

e EIS). Appendix D, Section  
tion of the probability of ship  
r vessels, increased volumes of  
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ision with a tanker and that the  
(Attachment D5 to Appendix

incident scenarios that involve  
found in Section D.5.4. The  
neither the consequences nor

in Section 5.4.2 of the EIS,  
train for rail) while traveling  
> terrorists from attempting an  
EIS presents an analysis of an  
The consequences of such a  
umerous fatalities and injuries  
ter harm to the general health  
1 than caused by the release of  
sporation task.

-type event or from any cause  
yzed in Section 4.2.2.3 of the  
an intervention (such as fire-  
accident would not be affected  
e described by the commentor  
ens, so the results presented in  
f the accidents that might be

f various accidents divided all  
ion D.5.3.1.1 of the EIS). The  
nes that the ship carrying the

**COMMENTOR No. 90: PATRICK, DIANA L.**

**RESPONSE TO COMMENT**  
**COMMENTOR No. 90: PATRICK, DIANA L.**

foreign research reactor spent nuclear fuel transportation cask is in a collision with a tanker and that a fire occurs that engulfs the damaged transportation casks. The consequences of accidents, including category six accidents (the worst case scenario), are discussed in Appendix D, Section D.5.4.2.2.

***Response to Comment No. 90-11***

The calculated risk associated with the shipment of foreign research reactor spent nuclear fuel is the product of the consequences of an accident and the probability of the accident occurring. The sharing of a waterway with shipments of hazardous materials is contained within the calculated risk. Additional hazardous material shipments or increased volumes per shipment would not change the accident consequences because the most severe accidents credible have been assumed by the accident analysis. As explained in response to Comment 90-6 above, increasing the volume of ship traffic does not significantly increase the probability of an accident.

**COMMENTOR No. 92: RUBY, LAWRENCE****RESPONSE TO COMMENT  
COMMENTOR No. 92: RUBY, LAWRENCE**

663 Carrera Lane  
Lake Oswego, OR 97034  
30 May 1995  
S. Head  
Spent Nuclear Fuel Management (EN-37)  
President of Energy  
1000 East End Avenue, S.W.  
• DC 20585

**92-1  
92-2  
92-1  
92-2  
92-1  
92-2****Response to Comment No. 92-1**

DOE considers that the U.S. Department of Transportation regulations do allow ground transport of spent nuclear fuel from the Port of Portland. DOE has not yet selected ports, routes, or transport modes for the foreign research reactor spent nuclear fuel. A State of Oregon routing agency could designate a preferred route, which the shipments would be required to follow, in accordance with 49 CFR Part 397.103.

In addition, to further address this issue, individual Transportation Plans would be prepared for any shipments actually scheduled for acceptance through the Port of Portland (or any other port of entry). These Transportation Plans would be prepared in consultation with appropriate State and/or local officials to ensure that details of the transportation process are understood, that the individuals or organizations who would perform all required activities are specified, and that these individuals and parties know what is expected of them (Section 2.7.5 and Appendix H of the Final EIS).

**Response to Comment No. 92-2**

The Port of Astoria, Oregon, was considered as a possible port for receiving the foreign research reactor spent nuclear fuel. It was rejected because the port does not have appropriate experience (Appendix D, Section D.1.9.1 of the EIS).

There are two instances in which barge transport would be feasible as a substitute for truck or rail transport of foreign research reactor spent nuclear fuel: (1) up the Columbia River to the Hanford Site and (2) up the Savannah River Site. New analysis on these two possible barge transport routes has been inserted into Appendix E, Section E.8.15 of the EIS. The net result of this analysis is that barge transport would present approximately the same level of risk to workers and the public as would truck or rail transport. This level of risk is low and the most likely outcome would be zero latent cancer fatalities.

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE would be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel managed by DOE would be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

Sincerely,

*Lawrence Ruby*

Lawrence Ruby

State Fire and Nuclear  
S. Hatfield and Packwood  
Oregon Dept. of Energy

writing to summarize my testimony presented before you on 25 May.  
DOE/TIS-0210D. By way of background, I am a registered professional  
nuclear (California) and during my career I have supervised 2 research  
ith fuel of the type described in the EIS. These activities occurred  
nd as Professor of Nuclear Engineering at UC Berkeley, and as  
f Nuclear Science at Reed College, Portland.

EIS in Volume 2, page 63 ff, proposes to move spent nuclear fuel from  
Hanford or INL by ocean freighter to the Port of Portland, where  
s would be off-loaded to a warehouse. Subsequently, the casks  
loaded to trucks or train for transport through the northern part of  
and thence east along the south side of the Columbia River.

Portland, Oregon and Berkeley, California are surrounded by  
an areas of about 1.2 million people. However, in contrast to a  
here, a few years ago, research reactor fuel was moved through the  
Berkeley in compliance with DOT regulations, the proposed transport  
route of Portland is NOT in compliance with DOT regulations. DOT  
specify, with respect to the transport of high-level radioactive  
material, "a preferred route must be selected which minimizes radiological  
routes around cities, where possible, or an alternate route  
a State routing authority." In the case of Berkeley, the more  
y streets was necessary, because the reactor being decommissioned  
d in downtown Berkeley, but in the case of Portland, an alternative  
able with much lower radiological risk. The alternative is  
n U.S. Navy methodology for moving high-level radioactivity to  
INL. In the alternative routing, ocean freighters would off-load  
s onto barges at Astoria, which would then be towed up the  
ver until they are well past the city of Portland, at which point the  
be transferred to either truck or rail transport, headed east.

## SECTION 2.7: INDIVIDUALS

*Pro Comment  
TENNANT, ELIZABETH M.*

"in the draft EIS. DOE's preferred alternative final EIS.

uget Sound, and the Port of Tacoma, is noted. r of entry, DOE developed evaluation criteria e foreign research reactor spent nuclear fuel. tors identified by the port selection process, ificant risk to either the port personnel or the ith an accident would be low (Sections 4.2.2.3 th incident-free handling of the spent nuclear (Sections 4.2.2.2 and 4.5 of the EIS).

foreign research reactor spent nuclear fuel at l in Section 1.5 of the EIS, the selection of the actor spent nuclear fuel would be managed is of Energy Programmatic Spent Nuclear Fuel ng Laboratory Environmental Restoration and al Impact Statement. The Record of Decision In accordance with this Record of Decision, reactor spent nuclear fuel managed by DOE in South Carolina. Any other foreign research [DOE will be managed at the Idaho National eign research reactor spent nuclear fuel would

action to keep the foreign research reactor program is noted.

nt Alternative 2, Subalternative 1a. (Overseas ed in Section 2.3 and the policy considerations Section 4.4.1 of the EIS.

**M. (Cont'd.)**

spent nuclear fuel from [redacted]  
fuel is LEU, and from  
[redacted], a leadership role in  
ation. In this role, it  
ther nations to support  
Britain, France, Japan,  
weapons proliferation  
policy are included in

[redacted] EU in the policy is that  
foreign research reactor  
as necessary because  
Also, as explained in  
fuel storage at foreign

ould safely be received  
urity such as might be  
vided for the foreign  
meet or exceed all the  
is (10 CFR Part 73). If  
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security. Nevertheless,  
ary ports is noted.

incident-free operations  
iders that commercial  
ipable option for the  
tion 4.2.2.3 of the EIS  
pacts of incident-free

**COMMENTOR No. 93: TENNANT, ELIZABETH M. (Cont'd.)**

**RESPONSE TO COMMENT**  
**COMMENTOR No. 93: TENNANT, ELIZABETH M. (Cont'd.)**

***Response to Comment No. 93-7***

According to U.S. regulation, all workers who handle or come in contact with spent nuclear fuel are required to receive appropriate prior training. Details of emergency preparedness and security measures for port activities as well as ground transportation would be contained in the Transportation Plan that would be prepared prior to any individual spent nuclear fuel shipment and coordinated with State and local officials. The general provisions of the Transportation Plan are included in Appendix H, which was added to the final EIS in response to public comments. The provisions include an interface between DOE and State, Tribal, and local authorities, prior to the implementation of the policy, for the identification and resolution of emergency management and security issues specific to the communities that would be affected. These issues include capabilities and training of first emergency responders.

***Response to Comment No. 93-8***

See the response to Comment 93-1.

**RESPONSE TO COMMENT**  
**COMMENTOR No. 95: BONDE, FREDERICK J.**

J.

3 NE 109th  
WA 98125  
June 1, 1995

**Response to Comment No. 95-1**

The commentor's opposition to use of the Ports of Portland or Tacoma to receive foreign research reactor spent nuclear fuel is noted. As a part of the overall evaluation of impacts, DOE is identifying ports of entry in the United States that are acceptable for the receipt and handling of foreign research reactor spent nuclear fuel. Portland and Tacoma are included in this evaluation. The analysis in the EIS indicates that the use of any of the ports indicated by the port selection process would not pose any significant risk to either the port personnel or the population near the port.

**Response to Comment No. 95-2**

The analysis of impacts associated with accidents and incident-free operations involving foreign research reactor spent nuclear fuel demonstrate that commercial ports and facilities represent an acceptable option for the acceptance of foreign research reactor spent nuclear fuel (Section 4.2.2.3 of the EIS) on consequences of port accidents and Section 4.2.2.2 for impacts of incident-free operation). Likewise, based on the analysis of impacts associated with accidents and incident-free operations, the analysis in the EIS indicates that commercial ships represent an acceptable option for the transport of foreign research reactor spent nuclear fuel (Section 4.2.2.3 of the EIS on consequences of port accidents and Section 4.2.2.2 for impacts of incident-free operation). The analyses indicate that there would be no reduction in the risks of the proposed action associated with the use of dedicated or military ships, nor any adverse consequences to the use of the commercial ships or facilities.

In regard to fire, Appendix D, Section D.5.3.1 of the EIS describes several accident scenarios that involve fire. The results of the analysis of these accidents can be found in Section D.5.4. The analysis in Appendix D, Section D.5.5 of the EIS indicates that even in the event of a severe ship fire, neither the consequences nor risks are great. Although such a catastrophic accident would obviously impact the local environment, no significant impacts are predicted due to the presence of foreign research reactor spent nuclear fuel. In fact, the analysis of impacts associated with an accident involving foreign research reactor spent nuclear fuel also determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident (Section 4.2.2.3 of the EIS).

**Response to Comment No. 95-3**

The analysis of impacts associated with accidents and incident-free operations involving foreign research reactor spent nuclear fuel, demonstrate that commercial ports and facilities represent an acceptable option for the transportation of foreign research reactor spent nuclear fuel (Section 4.2.2.3 on consequences of port accidents and Section 4.2.2.2 for

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**ONSE TO COMMENT  
BONDE, FREDERICK J. (CONT'D.)**

argo on a scheduled carrier or on a chartered ship, no  
be required by the Coast Guard or any other authority.  
nal requirements to use dedicated or military ships, nor  
use of the commercial ships or facilities.

5-4

cepting foreign research reactor spent nuclear fuel from  
risk, where the spent nuclear fuel is LEU, and from  
ble is noted.

the past, and continues to assume, a leadership role in  
of nuclear weapons nonproliferation. In this role it  
RTR program and encouraged other nations to support  
s which have supported it may not currently present the  
ion risk as others. The reasons for considering these  
uded in Section 1.3 of the EIS.

EIS, the reason for including LEU in the policy is that  
acceptance as an entitlement for foreign research reactor  
LEU fuel use. The entitlement was necessary because  
effective as with HEU fuel.

5-5

the alternative of dry cask storage overseas is noted.  
EIS as part of Management Alternative 2, Subalternative  
EIS).

5-6

the EIS, the selection of the site or sites at which the  
uclear fuel would be managed is based on the analysis in  
grammatic Spent Nuclear Fuel Management and Idaho  
y Environmental Restoration and Waste Management  
t Statement. The Record of Decision for this EIS was  
ordance with this Record of Decision, all of the aluminum-  
pent nuclear fuel managed by DOE will be managed at  
th Carolina. Any other foreign research reactor spent  
OE will be managed at the Idaho National Engineering  
ign research reactor spent nuclear fuel would be shipped

**COMMENTOR No. 96: DREIZEN, DIANE****RESPONSE TO COMMENT  
COMMENTOR No. 96: DREIZEN, DIANE**

I want a record of all decisions

Written Comments on the Draft Environmental Impact Statement  
on a Proposed Nuclear Weapons Nonproliferation Policy  
Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Diane Dreizen Phone: \_\_\_\_\_  
Title and Organization: Citizen  
Address: 4717 SW Fairhaven Drive  
City: Portland, OR Zip: 97221

...COMMENTS...

High level nuclear waste is exposed to added risk by transport. the safest thing is to leave waste where it is made.  
The longshoremen are not trained in nuclear waste handling.  
The Port of Portland is not prepared for any nuclear accidents.  
The exposure risks due to accidents are unacceptable in a city center of any size.

Management Alternative 2 is best - avoid foreign nations with storage

To Mail In Comments, Address Correspondence to:  
Mr. Charles R. Head  
Office of Spent Fuel Management, EM-37  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-0010

We don't want any nuclear waste - stop producing it!!!

**Response to Comment No. 96-1**

When DOE has completed the Record of Decision, as required under NEPA, the public may request copies as the information is public and notice of the availability of the Record of Decision will be provided in the Federal Register. In addition, all commentors who provided DOE with their name and proper address will be mailed a copy of the Record of Decision.

**Response to Comment No. 96-2**

Foreign research reactor operators cannot indefinitely store their spent nuclear fuel at the reactor site. The intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS). Radiological and non-radiological risks during transportation were evaluated and found to be low (Section 4.2.3 of the EIS).

**Response to Comment No. 96-3**

The foreign research reactor spent nuclear fuel is radioactive material, however, the dose rates from the casks used to transport it would be low. No special handling or loading/unloading procedures would be required for the foreign research reactor spent nuclear fuel when it is contained in standard shipping containers; experience with handling containers is sufficient. Therefore, no special training of longshoremen is required.

**Response to Comment No. 96-4**

DOE considers that if foreign research reactor spent nuclear fuel is managed in the United States, there is adequate regulatory and emergency preparedness infrastructure to ensure its safe acceptance and transportation to the designated management sites. As discussed in Section 2.7.1 of the EIS, Federal funding to State, Tribal, and local governments is being provided for maintaining emergency response programs. There are three national emergency response plans under which DOE provides radiological monitoring and assessment assistance. Under these plans, DOE provides technical advice and assistance to the State, Tribal, and local agencies involved with a radiological incident.

Emergency preparedness, security, and coordination of DOE with local emergency response authorities that would be involved with the acceptance and transportation of foreign research reactor spent nuclear fuel will be discussed in detail in the DOE Transportation Plan, that would be prepared prior to any individual spent nuclear fuel shipment and coordinated with State and local officials. The general provisions of the Transportation Plan are included in Appendix H, which was added to the final EIS in response to public comments.

**Response to Comment No. 96-1**

96-1

**Response to Comment No. 96-2**

96-2

**Response to Comment No. 96-3**

96-3

**Response to Comment No. 96-4**

96-4

**Response to Comment No. 96-5**

96-5

**Response to Comment No. 96-6**

96-6

**Response to Comment No. 96-7**

96-7

## SECTION 2.7: INDIVIDUALS

### NE (CONT'D.)

accidents are too high in EIS describe risks estimated and at interim management 1 with the proposed action

storage is noted. This is issued in Sections 2.3 and

or other types of nuclear fuel from foreign 1.2 of the EIS describes nations for foreign research

**to COMMENT  
: JOHNSTON, ANNE B.**

sign research reactor spent nuclear fuel through  
er evaluation against the port selection criteria  
of the EIS, the Port of Seattle was eliminated  
n Sections 4.2.2 and 4.5 of the EIS indicates  
t nuclear fuel to the Port of Tacoma, or to any

ed (weapons-grade) uranium in civil programs  
t developed LEU fuels for foreign research  
research reactor operators converted to LEU  
nuclear fuel would be accepted for disposition  
a action is taken, many foreign research reactor  
s before they can develop means for overseas  
the use of HEU fuels, since these fuels can  
sed. It would be imprudent to publicly label  
ed States (Section 2.10 of the EIS). Negative  
ions so designated would likely preclude their  
al commerce in HEU.

native of overseas storage is noted. This is  
2 la which is discussed in Sections 2.3 and

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ear fuel, the EIS demonstrates that commercial  
e transport of foreign research reactor spent  
consequences of port accidents and Section  
r). The analyses demonstrate that there would  
the use of dedicated or military ships, nor any  
nmercial ships or facilities.

rical risks during shipments of spent nuclear  
a and land are given in Section 4 of the EIS.

## SECTION 2.7: INDIVIDUALS

(Cont'd.)

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harging developed

**COMMENTOR No. 98:**  
**HUTCHISON, WILLIAM T. & MARIANNE D.**

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**RESPONSE TO COMMENT**  
**COMMENTOR No. 98:**  
**HUTCHISON, WILLIAM T. & MARIANNE D.**

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292 Bampfield Drive  
 Mount Pleasant, SC 29464  
 May 29, 1995

Charles R. Head  
 Office of Spent Fuel Management  
 EM-37  
 US Department of Energy  
 1000 Independence Ave.  
 Washington, DC 20585-0001

Dear Mr. Head:

This is to comment on the proposal to ship used nuclear fuel rods through the Wando Terminal located near Charleston, South Carolina.

We oppose this idea.

The area in near proximity to the Wando Terminal has had explosive population growth in the past few years. Our home is located one-half mile from the Wando Terminal.

We do not want these rods in such close proximity to our home, to us, to our friends, to our neighbors, or to our relatives.

Very sincerely yours,

*William T. Hutchison*  
 William T. Hutchison  
*Marianne D. Hutchison*  
 Marianne D. Hutchison

**Response to Comment No. 98-I**

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Charleston is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Charleston, or to any of the ports analyzed in the EIS, is low.

Appendix D of the EIS has been revised to specifically note the presence of Mount Pleasant in the immediate vicinity of the Wando Terminal, and the rate of population growth of Mount Pleasant (Attachment 2 to Appendix D). The demographic data pertaining to Mount Pleasant were considered in application of the port selection criteria, but still resulted in the Port of Charleston (that is, the Wando Terminal in Mount Pleasant) being identified as one of the proposed ports of entry.

**98-I**

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## SECTION 2.7: INDIVIDUALS

SNT  
LKING, LEE

clear fuel from foreign research spent nuclear fuel is described

United States in management of led. The commentor's position in Section 2.5 of the EIS. As action Alternative would have a nproliferation policy.

f the site or sites at which the aged is based on the analysis in r Fuel Management and Idaho ration and Waste Management d of Decision for this EIS was of Decision, all of the aluminum- ed by DOE will be managed at foreign research reactor spent the Idaho National Engineering it nuclear fuel would be shipped

Portland, Seattle, or Tacoma to ed. The port selection criteria ify ports that can safely handle ded from further consideration n the EIS indicate that the use of including Tacoma or Portland, onnel, local environment, or the es that the risks associated with nd that the risks associated with pent nuclear fuel casks are also

**COMMENTOR No. 100: WALKING, LEE (CONT'D.)****RESPONSE TO COMMENT  
COMMENTOR No. 100: WALKING, LEE (CONT'D.)*****Response to Comment No. 100-4***

As discussed in Section 2.2.1.2 and 2.2.2.3 of the EIS, several financing options have been considered, ranging from collection of fees from the research reactor operators that would pay all of the costs of the program to full subsidization of the program by DOE. A compromise between these extremes would be for developed countries to be charged a competitive fee, while U.S. taxpayers would absorb the full costs of the program for developing countries and absorb the amount above a competitive fee for developed countries to accept and manage their spent nuclear fuel. The reason for the United States to "pay for other people's garbage" is to reduce the risk of the spread of nuclear weapons to additional countries who might use them against the United States or our allies.

**RESPONSE TO COMMENT**  
**COMMENTOR No. 101: Rood, Marion**

***Response to Comment No. 101-1***

Inventor's opposition to bringing foreign research reactor spent nuclear fuel through Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS states that the risk associated with bringing spent nuclear fuel to the Concord NWS, by the ports analyzed in the EIS, is low.

***Response to Comment No. 101-2***

Message from San Francisco Bay to Concord meets the requirements of Criterion 2 (Safe Transit From Open Ocean) for port selection (Appendix D, Section D.1.9 of the EIS). The favorable transit from open ocean is only one of the considerations in selecting ports of entry for the foreign research reactor spent nuclear fuel. Other factors, such as port population, population along the route to the management port experience with handling containers, and port facilities would be considered in the final selection of ports of entry. Appendix D, Section D.1.9 of the EIS provides details of the port selection process.

Port selection criteria do not consider the existence of land-based facilities such as cities because they have no direct impact on the risk associated with the shipment of research reactor spent nuclear fuel. The worst case accident is considered to be a collision of the ship carrying the foreign research reactor spent nuclear fuel with a sun tanker. In this accident the transportation cask is damaged in the collision, injected to a fire that resulted from the collision (Appendix D, Section D.5). The potential of some mishap at a land-based facility would not add to the severity of this event, and so was not considered. Section 4.2.2.3 of the EIS discusses the assumptions built into the port accident analysis and the results of those analyses.

***Response to Comment No. 101-3***

As yet selected ports, routes, or transport modes for the foreign research reactor spent nuclear fuel. If Concord NWS is selected, then DOE would choose the best route 30 in accordance with Department of Transportation regulations (49 CFR Part 11 (a)(2)). That route could use Route 4, Route 24, and/or Waterfront Road. The California routing agency can designate a preferred route, which the shipments be required to follow, in accordance with 49 CFR Part 397.103. DOE considers the roads leading out of the Concord NWS are adequate for this task.

***Response to Comment No. 101-4***

unlikely event of a severe accident, the analysis performed for the EIS indicates some radioactive material could be released from the cask and distributed into the

**COMMENTOR No. 101: Rood, MARION (Cont'd.)****RESPONSE TO COMMENT**  
**COMMENTOR No. 101: Rood, MARION (Cont'd.)**

environment. However, the analysis of impacts associated with an accident involving foreign research reactor spent nuclear fuel also shows that the resultant contamination is so small that no cleanup would be required in any of the ports or surrounding areas. This result can be expected because the quantities of radioactive material present inside the cask are small, and even in the case of the worst accident, only a small part escapes the cask. Close in to the accident, near the cask would likely require some cleanup, but the overall impact on the air and water quality in the port would be very small. The analysis also determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident. Section 4.2.2.3 and Appendix D, Section D.5 of the EIS detail the accident analysis and results.

**Response to Comment No. 101-5**

The basic purpose of this EIS is to provide an evaluation of environmental impacts that could result from management of spent nuclear fuel from foreign research reactors. An evaluation of the national nuclear development philosophy is beyond the scope of this EIS (Section 1.3 of the EIS).

**COMMENTOR No. 102: JENSEN, DAVID**

**RESPONSE TO COMMENT**  
**COMMENTOR No. 102: JENSEN, DAVID**

May 23, 1995

Charles Head  
 Office of Site Management EM-37  
 U.S. Department of Energy  
 1000 Independence Ave. SW  
 Washington, DC 20585

Dear Mr. Head:

I am writing to comment on the draft EIS proposing shipment of high-level nuclear waste through Puget Sound or Portland for possible storage at Hanford.

I support the "preferred" alternative of the EIS: that such waste be stored at reactor sites with international monitoring to ensure that fuel is not diverted for extraction of enriched uranium.

I strongly oppose importation of spent fuel from nations that do not pose a proliferation risk, of low enriched uranium that can't be used in bombs, and where dry cask storage is feasible and would allow international inspection. This reduces transportation risks.

I also strongly oppose using commercial freighters or public ports in large cities. This is necessary to protect longshore workers, the public on local roads and the public in event of shipboard fire. Use dedicated or military ships and DOD ports.

Finally I strongly oppose importation of high-level nuclear wastes for storage at Hanford. Hanford already has cooling basins which leak into the Columbia River and which are subject to failure in event of earthquake. The new facility proposed for Hanford's wastes should NOT be increased in size to accommodate foreign nuclear wastes--USDOE is already having trouble funding safety upgrades and fuel removal from the cooling basins.

Other nations must pay the costs of their nuclear programs. It is not for the U.S. to pay these costs and bear the environmental burden and health risks.

Sincerely,

David Jensen

**Response to Comment No. 102-1**

No "preferred" alternative was identified in the draft EIS. The commentor's preference for the alternative of overseas storage is noted. This is Management Alternative 2, Subalternative 1a, which is discussed in Sections 2.3 and 4.4.1 of the EIS.

**Response to Comment No. 102-2**

The commentor's opposition to accepting foreign research reactor spent nuclear fuel from nations that pose no nuclear weapons proliferation risk, where the spent nuclear fuel is LEU, and from nations where dry storage is feasible is noted.

The United States has assumed in the past, and continues to assume, a leadership role in the world community in matters of nuclear weapons nonproliferation. In this role it initiated programs such as the RERTR program and encouraged other nations to support the program. Some of the nations which have supported the program may not currently present the same nuclear weapons proliferation risk as others. The reasons for considering these nations under this policy are included in Section 1.3 of the EIS.

As discussed in Section 1.1 of the EIS, the reason for including LEU in the policy is that the United States has offered LEU acceptance as an enticement for foreign research reactor operators to convert from HEU to LEU fuel. The enticement was necessary because operation with LEU fuel is not as effective as with HEU fuel. Also, as explained in Section 2.3, the opportunities for expanded spent nuclear fuel storage at foreign research reactor sites are limited or nonexistent.

**Response to Comment No. 102-3**

Based on the analysis of impacts associated with accidents and incident-free operations involving foreign research reactor spent nuclear fuel, DOE considers that commercial ports, facilities and commercial freighters represent an acceptable option for the transport of foreign research reactor spent nuclear fuel (Section 4.2.2.3 of the EIS on consequences of port accidents and Section 4.2.2.2 for impacts of incident-free operation).

**Response to Comment No. 102-4**

The EIS demonstrates that commercial ships represent an acceptable option for the transportation of foreign research reactor spent nuclear fuel (Section 4.2.2.3 of the EIS on consequences of port accidents and Section 4.2.2.2 for impacts of incident-free operation). The analyses demonstrate that there is no reduction in the risks of the proposed action associated with the use of dedicated or military ships, nor any adverse consequences to the use of the commercial ships.

NSE TO COMMENT  
02: JENSEN, DAVID (CONT'D.)

reactor spent nuclear fuel could safely be received past, without additional security such as might be provided for the spent nuclear fuel shipments all the applicable security requirements in the Code (art 73). If any port did not already provide security grants, it would be the responsibility of the shipper to pay. Nevertheless, the commentor's preference for ; noted.

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EIS, the selection of the site or sites at which the ar fuel would be managed is based on the analysis in umatic Spent Nuclear Fuel Management and Idaho nvironmental Restoration and Waste Management aternment. The Record of Decision for this EIS was nce with this Record of Decision, all of the aluminum- l nuclear fuel managed by DOE will be managed at Carolina. Any other foreign research reactor spent will be managed at the Idaho National Engineering research reactor spent nuclear fuel would be shipped

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2.2.2.3 of the EIS, several financing options have tion of fees from the research reactor operators that ram to full subsidization of the program by DOE. A s would be for developed countries to be charged a ayers would absorb the full costs of the program for e amount above a competitive fee for developed r spent nuclear fuel. The reasons the United States r countries are: 1) some countries would be unable to tation and would have no safe alternative means of e., the developing countries), and 2) some countries pons-grade nuclear material indefinitely unless the fee and absorbs any cost above that fee.

**COMMENTOR No. 103: HEATH, PAMELA****RESPONSE TO COMMENT  
COMMENTOR No. 103: HEATH, PAMELA**

MAY 23, 1995

Charles Head  
Office of Site Management EM-37  
U.S. Department of Energy  
1000 Independence Ave. SW  
Washington, DC 20585

Dear Mr. Head:

I am writing to comment on the draft EIS proposing shipment of high-level nuclear waste through Puget Sound or Portland for possible storage at Hanford.

I support the "preferred" alternative of the EIS: that such waste be stored at reactor sites with international monitoring to ensure that fuel is not diverted for extraction of enriched uranium.

I strongly oppose importation of spent fuel from nations that do not pose a proliferation risk; of low enriched uranium that can't be used in bombs; and where dry cask storage is feasible and would allow international inspection. This reduces transportation risks.

I also strongly oppose using commercial freighters or public ports in large cities. This is necessary to protect longshore workers, the public on local roads and the public in event of shipboard fire. Use dedicated or military ships and DOD ports.

Finally I strongly oppose importation of high-level nuclear wastes for storage at Hanford. Hanford already has cooling basins which leak into the Columbia River and which are subject to failure in event of earthquake. The new facility proposed for Hanford's wastes should NOT be increased in size to accomodate foreign nuclear wastes--USDOE is already having trouble funding safety upgrades and fuel removal from the cooling basins.

Other nations must pay the costs of their nuclear programs. It is not for the U.S. to pay these costs and bear the environmental burden and health risks.

Sincerely,  
  
Pamela Heath

**Response to Comment No. 103-1**

No "preferred" alternative was identified in the draft EIS. The commentor's preference for the alternative of overseas storage is noted. This is Management Alternative 2, Subalternative 1a, which is discussed in Sections 2.3 and 4.4.1 of the EIS.

**Response to Comment No. 103-2**

The commentor's opposition to accepting foreign research reactor spent nuclear fuel from nations that pose no nuclear weapons proliferation risk, where the spent nuclear fuel is LEU, and from nations where dry storage is feasible is noted.

The United States has assumed in the past, and continues to assume, a leadership role in the world community in matters of nuclear weapons nonproliferation. In this role it initiated programs such as the RERTR program and encouraged other nations to support the program. Some of the nations which have supported the program may not currently present the same nuclear weapons proliferation risk as others. The reasons for considering these nations under this policy are included in Section 1.3 of the EIS.

As discussed in Section 1.1 of the EIS, the reason for including LEU in the policy is that the United States has offered LEU acceptance as an enticement for foreign research reactor operators to convert from HEU to LEU fuel. The enticement was necessary because operation with LEU fuel is not as effective as with HEU fuel. Also, as explained in Section 2.3, the opportunities for expanded spent nuclear fuel storage at foreign research reactor sites are limited or nonexistent.

**Response to Comment No. 103-3**

Based on the analysis of impacts associated with accidents and incident-free operations involving foreign research reactor spent nuclear fuel, DOE considers that commercial ports, facilities and commercial freighters represent an acceptable option for the transport of foreign research reactor spent nuclear fuel (Section 4.2.2.3 of the EIS on consequences of port accidents and Section 4.2.2.2 for impacts of incident-free operation).

**Response to Comment No. 103-4**

The EIS demonstrates that commercial ships represent an acceptable option for the transportation of foreign research reactor spent nuclear fuel (Section 4.2.2.3 of the EIS on consequences of port accidents and Section 4.2.2.2 for impacts of incident-free operation). The analyses demonstrate that there is no reduction in the risks of the proposed action associated with the use of dedicated or military ships, nor any adverse consequences to the use of the commercial ships.

**RESPONSE TO COMMENT  
O. 103: HEATH, PAMELA (CONT'D.)**

research reactor spent nuclear fuel could safely be received as in the past, without additional security such as might be provided for the spent nuclear fuel shipments or exceed all the applicable security requirements in the Code CFR Part 73). If any port did not already provide security requirements, it would be the responsibility of the shipper to ensure security. Nevertheless, the commentor's preference for ports is noted.

**O. 103-5**

In the EIS, the selection of the site or sites at which the spent nuclear fuel would be managed is based on the analysis in Programmatic Spent Nuclear Fuel Management and Idaho Environmental Restoration and Waste Management Impact Statement. The Record of Decision for this EIS was in accordance with this Record of Decision, all of the aluminum- or spent nuclear fuel managed by DOE would be managed at South Carolina. Any other foreign research reactor spent DOE would be managed at the Idaho National Engineering foreign research reactor spent nuclear fuel would be shipped

**O. 103-6**

1.1.2 and 2.2.2.3 of the EIS, several financing options have been considered for the research reactor operators that the program to full subsidization of the program by DOE. A extremes would be for developed countries to be charged a taxpayers would absorb the full costs of the program for absorb the amount above a competitive fee for developed age their spent nuclear fuel. The reasons the United States is e costs for other countries are: 1) some countries are unable posed action and have no safe alternative means of managing the developing countries), and 2) some countries would absorb-grade nuclear material indefinitely unless the United fee and absorbs any costs above that fee.

SECTION 2.7: INDIVIDUALS

**RESPONSE TO COMMENT**  
**COMMENTOR No. 105: KRUEGER, PAT**

**Response to Comment No. 105-1**

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

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## SECTION 2.7: INDIVIDUALS

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## SECTION 2.7: INDIVIDUALS

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**COMMENTOR No. 107: FORM LETTER A (Cont'd.)**

**RESPONSE TO COMMENT**  
**COMMENTOR No. 107: FORM LETTER A (Cont'd.)**

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Individuals submitting this form letter:

Finsilver, E.J.

O'Connor, Tim

Oestrunko, Roland

Reeves, Florence P.

***Response to Comment No. 107-6***

The United States has in the past, and continues to play, a leadership role within the world community in matters of nuclear weapons nonproliferation. In this role, it initiated programs such as the RERTR program and encouraged other nations to support the program. Some of the nations which have supported the program such as Britain, France, Japan, Sweden and others may not currently present the same nuclear weapons proliferation risks as other nations. The reasons for considering these nations under this policy are included in Section 1.3 of the EIS.

***Response to Comment No. 107-7***

The corrections identified by the commentor have been incorporated into the EIS.

***Response to Comment No. 107-8***

The worst accident analyzed involves the foreign research reactor spent nuclear fuel cask being damaged, then engulfed to a long-duration fire. A scenario that includes high explosives was not considered. Rather, administrative controls would be in place to preclude the handling of high explosives while the foreign research reactor spent nuclear fuel was on Concord NWS or in a ship near Concord NWS. While there would be high explosives in Concord NWS's bunkers while the foreign research reactor spent nuclear fuel was being handled, as long as the high explosives were not handled concurrently, there is little danger of explosion.

***Response to Comment No. 107-9***

Appendix D, Section D.5 of the EIS discusses the potential impacts and risks associated with low probability events such as ship crashes followed by severe fires. Given that Buchanan Field is a general aviation field located about 6 miles from the piers which could receive spent nuclear fuel shipments at Concord, and the air traffic near Concord NWS is controlled by the Federal Aviation Administration such that air traffic into and out of Buchanan Field is not over Concord NWS, it is unlikely that the probability of or consequences from a small aircraft crash are as large as the probabilities and risks of ship crashes and fires in the ship channel or at the pier. The crash of an aircraft into a ship carrying one or more casks of spent nuclear fuel is a low probability event which might initiate a severe accident. Therefore, based on the low probability of this accident scenario, it is not necessary to consider additional risk analysis since this scenario falls within the range of accident analysis already performed for the EIS and would not significantly affect the total risks already analyzed.

**COMMENTOR No. 107: FORM LETTER A (CONT'D.)****RESPONSE TO COMMENT  
COMMENTOR No. 107: FORM LETTER A (CONT'D.)*****Response to Comment No. 107-10***

CEQ regulations and guidance do not require a worst case analysis of accidents in an EIS. For the purpose of analysis in the EIS, there is no such thing as a worst case scenario because for any worst case that is postulated, a still more severe accident can be postulated by adding one more drum of gasoline, one more wrecked rail car, one more terrorist, etc. In addition, for each assumption that is made to make a postulated accident more severe, the probability of the accident becomes more remote. Nevertheless, DOE did analyze the severe accident in which a ship carrying a spent nuclear fuel transportation cask is involved in a collision with another ship, severe enough to breach the transportation cask and then subject the cask to a fire resulting from the collision (Section 4.2.2.3 of the EIS). These conditions are the same as the worst conditions that might be expected to result from the collision of a ship carrying a spent nuclear fuel transportation cask with a petroleum tanker. The EIS does not explicitly consider the existence of land-based facilities such as refineries because the addition of some mishap at a land-based facility would not add to the severity of the worst plausible accident. Instead, the port selection process considered whether a favorable transit to and from open water exists considering parameters such as navigation hazards and the distance from the port to the open ocean or large bay (Appendix D, Section D.1.9.2 of the EIS).

***Response to Comment No. 107-11***

The commentor's concerns are noted. The analyses presented in Section 4 of the EIS demonstrate that there would be no significant adverse or beneficial impacts on human health, wildlife, or the environment due to implementation of the proposed action. In addition, the analysis in the EIS indicates that the risks associated with an accident are low (Section 4.2.2.3) and that the risks associated with incident-free handling of foreign research reactor spent nuclear fuel are also low (Section 4.2.2.2).

**JEANNE & CHARLES**

**RESPONSE TO COMMENT  
COMMENTOR No. 108: POSEY, JEANNE & CHARLES**

May 25, 1995

**Response to Comment No. 108-1**

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk of bringing foreign research reactor spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

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**Response to Comment No. 108-2**

Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. As stated in Section 2.6.2 of the EIS, in over four decades of spent nuclear fuel shipments, no transportation cask has ever released any of its contents (radioactive material) as a result of an accident. Spent nuclear fuel transportation casks passing through the Bay area to Concord NWS, or in any other port or waterway, cannot leak because the metallic fuel is transported dry. Based on past experience, DOE considers that the foreign research reactor spent nuclear fuel transportation casks would not release their radioactive contents, and would thus not affect the quality of the water. A paragraph has been added to Section 4.2.2.2 of the EIS to make this point and to emphasize the no-impact nature of these shipments on air and water quality.

**Response to Comment No. 108-3**

Use of a remote port could slightly reduce the consequences of an accident which are low (Section 4.2.2 of the EIS), however, there are other considerations that also must be made when making port selection. Appendix D, Section D.1.9 of the EIS presents a complete discussion of the port selection process.

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**SECTION 2.7: INDIVIDUALS**

**NSE TO COMMENT  
#: PERKINS, SUSAN J. (Cont'd.)**

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The alternative of overseas storage is noted. This is alternative 1a, which is discussed in Sections 2.3 and 2.4. There is no reference for dry cask storage at the research reactor.

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EIS, the selection of the site or sites at which the nuclear fuel would be managed is based on the analysis in the Idaho Environmental Spent Nuclear Fuel Management and Idaho Environmental Restoration and Waste Management Plan. The Record of Decision for this EIS was issued with this Record of Decision, all of the aluminum nuclear fuel managed by DOE will be managed at South Carolina. Any other foreign research reactor spent fuel will be managed at the Idaho National Engineering Research Reactor. Spent nuclear fuel would be shipped

**TO COMMENT  
CROWLEY, SUSAN GARRETT**

ation of foreign research reactor spent nuclear interim storage site for spent nuclear fuel from

the selection of the site or sites at which the would be managed is based on the analysis in Spent Nuclear Fuel Management and Idaho Environmental Restoration and Waste Management nt. The Record of Decision for this EIS was ith this Record of Decision, all of the aluminum ar fuel managed by DOE will be managed at na. Any other foreign research reactor spent e managed at the Idaho National Engineering ch reactor spent nuclear fuel would be shipped

n for the water quality in the Columbia River ould be no significant adverse impacts to any reign research reactor spent nuclear fuel might transportation casks are designed and built to Transportation casks passing through the clear fuel would be shipped dry), and would As stated in Section 2.6.2 of the EIS, to date no ever released any of its contents (radioactive graph has been added to Section 4.2.2.2 of the these shipments on air and water quality'

/ from the Hanford Site, are beyond the scope ent 110-1, above.

na is tired of being considered a waste facility, el is accepted into the U.S., it should be noted its way to a management site, remaining in the r hours. Thus, neither Tacoma, nor any of the used as a waste facility.

**COMMENTOR No. 110: CROWLEY, SUSAN GARRETT (Cont'd.)**

**RESPONSE TO COMMENT**  
**COMMENTOR No. 110: CROWLEY, SUSAN GARRETT (Cont'd.)**

***Response to Comment No. 110-3***

An objective of the proposed action is to keep weapons-grade nuclear materials out of the hands of nations that wish to develop a nuclear weapons capability (Section 1.2 of the EIS). While sovereign nations can pursue nuclear weapons capability if they wish, United States' policy is to deny those nations both the required materials and technology necessary for a successful pursuit (Sections 1.1 and 1.2 of the EIS).

***Response to Comment No. 110-4***

The commentor's preference for the alternative of overseas storage is noted. This is Management Alternative 2, Subalternative 1a, which is discussed in ( Sections 2.3 and 4.4.1 of the EIS). The commentor's preference for dry cask storage at the research reactor sites is likewise noted.

**RESPONSE TO COMMENT**  
**COMMENTOR No. 115: HAMMER, BRUCE**

***Response to Comment No. 115-1***

Commentor's opposition to bringing foreign research reactor spent nuclear fuel through Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS notes that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, many of the ports analyzed in the EIS, is low.

***Response to Comment No. 115-2***

Part of the overall evaluation of environmental impacts associated with the shipment of foreign research reactor spent nuclear fuel, the EIS identifies ports of entry in the United States that are acceptable for the receipt and handling of foreign research reactor nuclear fuel. In evaluating and selecting acceptable ports of entry, evaluation criteria developed to use in selecting ports of entry (Appendix D, Sections D.1.8 and D.1.9). Criteria includes such factors as transit from open ocean, port population, population along the route to the management site, port experience with handling containers, and port facilities. While 153 commercial and eight military ports were initially considered, 126 ports which are determined to be acceptable might be used in the case that research reactor spent nuclear fuel is accepted into the United States.

**SECTION 2.7: INDIVIDUALS**

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**SPONSE TO COMMENT**  
**No. 117: PEARSON, NANCY**

**117-1**

t case scenario because for any worst case that is postulated, one be postulated by adding one or more drum of gasoline, one or terrorist, etc. In addition, for each assumption that is ident more severe, the probability of the accident becomes an a worst-case scenario, but a broad range of port accident idents, is discussed in Section 4.2.2.3 of the EIS. Appendix IS presents the risks of a very high temperature fire that of a sensitivity study on release fractions.

**117-2**

as the security measures that would be taken to ensure that le risks of terrorism or theft of materials. DOE considers spent nuclear fuel could safely be received at commercial out additional security such as might be present on military he security provided for the spent nuclear fuel shipments exceed all the applicable security requirements in the Code FR Part 73. If any port did not already provide security irements, it would be the responsibility of the shipper to al security. Nevertheless, the commentor's preference for noted.

ded to Section 2.6.3.1 of the EIS to discuss why special except of foreign research reactor spent nuclear fuel.

ilitary facilities because of special training, spent nuclear cators is shipped in standard ISO containers, and does not (Section 2.6.3.2.2 of the EIS); experience in handling f the candidate ports have, is all that is necessary.

nt that Tacoma is tired of being considered a waste facility, if nuclear fuel is accepted into the U.S., it would only pass DOE management site, remaining in the Tacoma area for rs. Thus, neither Tacoma nor any of the other nine potential a waste facility.

**COMMENTOR No. 118: GRAHAM, AMIE-RUTH K.**

## Public Opinion Survey

The Port of Tacoma Commission is seeking citizen input on the issue of potential shipments of spent nuclear fuel elements through the Port of Tacoma.

We appreciate your comments and concerns on this important issue. We will forward your comments to the Department of Energy. To have your opinion count, please fill out his form and mail it to the Port of Tacoma, P.O. Box 1837, Tacoma WA 98401 by June 19, 1995. You may also send it by facsimile to (206) 593-4570.

### SURVEY: NUCLEAR FUEL ELEMENT SHIPMENTS THROUGH TACOMA

I oppose spent nuclear elements being shipped through the Port of Tacoma.

I am in favor of spent nuclear elements being shipped through the Port of Tacoma.

I am undecided.

COMMENTS: I feel that the possible risks are  
by far outweighed by the short term benefits.  
The risk involved as "slight" as it is;  
I feel is not worth the few jobs that  
it would create. I would personally not  
risk my life or many people in my acquaintance  
have discussed this and would consider it  
far strongly against these products  
item #1 through port of Tacoma or our  
city streets and rail systems.

Name: Amie-Ruth K. GRAHAM Telephone: 561-33770

Address: 601 N. Jackson #5 City/State/Zip Code: Tacoma WA 98405

\* For more information, contact the Office of Spent Fuel Management (EM-37), Office of Environmental Management, United States Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585

**RESPONSE TO COMMENT**  
**COMMENTOR No. 118: GRAHAM, AMIE-RUTH K.**

*Response to Comment No. 118-1*

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

*Response to Comment No. 118-2*

The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide (Section 1.2 of the EIS). The analysis in Section 4.2 of the EIS demonstrates that, the risks associated with implementation of the proposed action to human health or the environment would be low.

118-1

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SE TO COMMENT  
-119: BLOSE, CHARLENE J.

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ng foreign research reactor spent nuclear fuel through  
ever, analysis in Sections 4.2.2 and 4.5 of the EIS  
, bringing spent nuclear fuel to the Port of Tacoma,  
EIS, is low.

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153 commercial and eight military ports) as ports of  
nt nuclear fuel. These ports were evaluated against  
Section D.1.9 of the EIS), resulting in 10 ports that  
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tion D.1.9 of the EIS.

port selection process evaluates the port's experience  
necessarily for dealing with nuclear or radioactive  
.1 of the EIS). Although the foreign research reactor  
aterial, the dose rates from the transportation casks  
no special handling would be required; experience  
nt. The Port of Tacoma has significant experience  
perience selection criterion.

SECTION 2.7: INDIVIDUALS

***RESPONSE TO COMMENT  
COMMENTOR No. 120: ANDERSON, S.A.***

*Response to Comment No. 120-1*

The commentor's favorable statement on the use of the Port of Tacoma as the port of entry for foreign research reactor spent nuclear fuel is noted. The commentor's concerns about the preparation of the panel are noted. The Port of Tacoma is one of ten candidate ports of entry which are determined to be acceptable in the case that foreign research reactor spent nuclear fuel is accepted into the United States.

**RESPONSE TO COMMENT  
COMMENTOR No. 121: BLAKESLEE, ELIZABETH E.**

I: **BLAKESLEE, ELIZABETH E.**

**Union Survey**

zen input on the issue of potential shipments of  
Tacoma.

this important issue. We will forward your com-  
ur opinion count, please fill out this form and mail  
ma WA 98401 by June 19, 1995. You may also

**EL ELEMENT SHIPMENTS**  
**H TACOMA**

g shipped through the Port of Tacoma.  
is being shipped through the Port of Tacoma.

*Response to Comment No. 121-I*

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

**121-I**

Telephone: 531-8850

City/State/Zip Code: TACOMA, WA 98444

1 Management (EM-37), Office of Environmental  
Independence Avenue, SW, Washington, DC 20585

**RESPONSE TO COMMENT  
COMMENTOR No. 122: SUTHERLAND, MARTIN A.**

## Public Opinion Survey

The Port of Tacoma Commission is seeking citizen input on the issue of potential shipments of spent nuclear fuel elements through the Port of Tacoma.

We appreciate your comments and concerns on this important issue. We will forward your comments to the Department of Energy. To have your opinion count, please fill out his form and mail it to the Port of Tacoma, P.O. Box 1837, Tacoma WA 98401 by June 19, 1995. You may also send it by facsimile to (206) 593-4570.

### SURVEY: NUCLEAR FUEL ELEMENT SHIPMENTS THROUGH TACOMA

I oppose spent nuclear elements being shipped through the Port of Tacoma.

I am in favor of spent nuclear elements being shipped through the Port of Tacoma.

I am undecided.

COMMENTS: This is a thoughtful statement of Nuclear weapons  
16C - we must do all that we can to eliminate nuclear -(H-5)  
weapons.) to countries that do not follow the guidelines set down

20 - The benefits in the long term of having High Grade Uranium  
through the ports would be no economic for people in economy,  
20B5, etc.

Name: Martin A. Sutherland Telephone: 272-0555  
 Address: 2132 East Avenue City/State/Zip Code: Tacoma/WA 98004

\* For more information, contact the Office of Spent Fuel Management (EM-37), Office of Environmental Management, United States Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585

*Response to Comment No. 122-1*

The commentor's favorable statement on the use of the Port of Tacoma as the port of entry for foreign research reactor spent nuclear fuel is noted. The Port of Tacoma is one of ten candidate ports of entry which are determined to be acceptable in the case that foreign research reactor spent nuclear fuel is accepted into the United States.

*Response to Comment No. 122-2*

The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide (Section 1.2 of the EIS). HEU can be used to produce nuclear weapons.

*Response to Comment No. 122-3*

The commentor's position that acceptance of spent nuclear fuel from foreign research reactors would provide economic benefits at ports of entry is noted. Impacts of the proposed action are discussed in Section 4 of the EIS.

**COMMENTOR No. 123: PHILBRICK, JOHN**

**RESPONSE TO COMMENT**  
**COMMENTOR No. 123: PHILBRICK, JOHN**

## Public Opinion Survey

The Port of Tacoma Commission is seeking citizen input on the issue of potential shipments of spent nuclear fuel elements through the Port of Tacoma.

We appreciate your comments and concerns on this important issue. We will forward your comments to the Department of Energy. To have your opinion counted, please fill out this form and mail it to the Port of Tacoma, P.O. Box 1837, Tacoma WA 98401 by June 19, 1995. You may also send it by facsimile to (206) 593-4570.

### SURVEY: NUCLEAR FUEL ELEMENT SHIPMENTS THROUGH TACOMA

I oppose spent nuclear elements being shipped through the Port of Tacoma.

I am in favor of spent nuclear elements being shipped through the Port of Tacoma.

I am undecided. \*

COMMENTS:

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Name: John Philbrick Telephone: (206) 703-3520  
Address: 123-7 Decatur St. S.E. City/State/Zip Code: Seattle, WA

\* For more information, contact the Office of Spent Fuel Management (EIA-37), Office of Environmental Management, United States Department of Energy, 1000 Independence Avenue, SW, Washington, DC 20585

### Response to Comment No. 123-1

The commentor's favorable statement on the use of the Port of Tacoma as the port of entry for foreign research reactor spent nuclear fuel is noted. The Port of Tacoma is one of ten candidate ports of entry which are determined to be acceptable in the case that foreign research reactor spent nuclear fuel is accepted into the United States. If any foreign research reactor spent nuclear fuel were to be accepted into the United States, the selection of the actual port(s) of entry to be used would be made in the Record of Decision, subsequent to completion of this final EIS.

123-1

SECTION 2.7: INDIVIDUALS

**RESPONSE TO COMMENT**  
**R No. 124: WRIGHT, CURTIS**

**No. 124-1**

to bringing foreign research reactor spent nuclear fuel through  
1. The risk of releasing radioactive material from a foreign  
car fuel transportation cask as the result of a volcanic event  
d slides would be low. Transportation casks are designed and  
it punishment without releasing their contents (Section 2.6.2  
ud slide, even if it buried the cask or caused structures to fall  
or be expected to compromise the transportation cask.

probabilities, both marine and land, were based on national  
le locale-specific conditions only as they impact the national  
azards such as mud slides, while they might be the event that  
uch as those analyzed in the EIS, would not increase the  
nt, which were found to be minor for both marine and land

**RESPONSE TO COMMENT  
MENTOR No. 125: BRAUCHER, RICHARD MARK**

***to Comment No. 125-1***

Mentor's opposition to bringing foreign research reactor spent nuclear fuel through Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS at the risk associated with bringing spent nuclear fuel to the Port of Tacoma, the ports analyzed in the EIS, is low.

***to Comment No. 125-2***

re to comment 125-1, above.

***to Comment No. 125-3***

safety were primary considerations during the evaluation of environmental impacts proposed action (Section 4 of the EIS). The risks to human health and the potential effects associated with accepting foreign research reactor spent nuclear be low.

***to Comment No. 125-4***

States can influence, but not dictate, the development and application of technology in foreign nations through diplomacy and cooperative agreements. Policies of the United States support peaceful applications of nuclear for nations that agree not to develop nuclear weaponry (Sections 1.1 and 1.2). The proposed action does not require deactivation of foreign research reactors. Research, medical, and agricultural applications of foreign research reactors are described in Section EIS. Deactivation of domestic reactors is outside of the scope of this EIS 3 of the EIS).

## SECTION 2.7: INDIVIDUALS

m ec is m s dr id in ss o n ie ie it f e d a e u n e d

**COMMENTOR No. 127:**  
**GRANGER, MARK & ROCHELLE (Cont'd.)**

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**RESPONSE TO COMMENT**  
**COMMENTOR No. 127:**  
**GRANGER, MARK & ROCHELLE (Cont'd.)**

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***Response to Comment No. 127-5***

The benefit to the citizens of the United States from the proposed action, including those in potential ports of entry, along transportation routes, or near potential management sites, is a reduction in the risk that weapons grade uranium from civil programs could be diverted into production of nuclear weapons that might be used against us or our allies. On the other hand, the analyses recorded in Section 4 of the EIS demonstrate that the risks associated with the proposed action are low.

***Response to Comment No. 127-6***

The analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk of bringing foreign research reactor spent nuclear fuel through the Concord NWS, or any other port, is low. The use of a remote port could slightly reduce the already low consequences of an accident, however there are other considerations that also must be made when making port selection. Appendix D, Section D.1.9 of the EIS presents a complete discussion the port selection process.

***Response to Comment No. 127-7***

The physical constraints of the passage from San Francisco Bay to Concord NWS were considered as part of the port selection process. The passage does meet the requirements of Criterion 2 (Favorable Transit From Open Ocean) for port selection (Appendix D, Section D.1.9.2 of the EIS). Also, the port selection criteria do not consider the existence of land-based facilities such as refineries because the addition of some mishap at a land-based facility would not add to the severity of the worst plausible accident, which is considered to be the collision of the ship carrying the foreign research reactor spent nuclear fuel with a petroleum tanker.

***Response to Comment No. 127-8***

The EIS contains the results of analysis of a severe accident in which a ship carrying foreign research reactor spent fuel is involved in a collision with another ship, severe enough to breach the spent nuclear fuel transportation cask and subject the cask to a fire resulting form the collision (Section 4.2.2.3). The results of this analysis show that the risk is low.

**RESPONSE TO COMMENT  
COMMENTOR No. 127:  
RANGER, MARK & ROCHELLE (CONT'D.)**

**Comment No. 127-9**

If public concern borne from a September, 1993 television report, the Contra Board of Supervisors initiated an investigation of the safety at Concord report on the subject, *Safety at the Concord Naval Weapons Station*, dated 1993, concluded in part that, "There were no incidents involving explosions exposure. Many of the reported incidents were not accidents caused by ion employees but, rather, were discoveries by employees that materials had been damaged during loading or transit. In some cases the shipments properly blocked, braced or banded."

safety record at Concord NWS is significantly better than that of similar ports in the private sector. According to the Department of Labor statistics, of marine cargo handling, the number of lost workday cases per 100 full-time workers in 1993 was 7.1 nationwide (1994 data not available), which is typical. of lost workday cases per 100 workers at Concord NWS for the first three cal year 1995 was 5.3, which is also typical for Concord.

**Comment No. 127-10**

ons and guidance do not require a worst case analysis of accidents in an purpose of analysis in the EIS, there is no such thing as a worst case scenario worst case that is postulated, a still more severe accident can be postulated ; more drum of gasoline, one more wrecked rail car, one more terrorist, etc. or each assumption that is made to make a postulated accident more severe, y of the accident becomes more remote.

that were performed to evaluate the impact of various accidents divided all six categories (Appendix D, Section D.5.3.1.1). The most severe accident use category 6, assumes that the ship carrying the foreign research reactor fuel transportation cask is in a collision with a tanker and that a fire occurs he transportation cask. The consequences of accidents, including category (the worst case scenario), are discussed in Appendix D, Section D.5.4.2.2.

**COMMENTOR No. 128: SEENO, C.M.****RESPONSE TO COMMENT  
COMMENTOR No. 128: SEENO, C.M.****Written Comments on the Draft Environmental Impact Statement  
on a Proposed Nuclear Weapons Nonproliferation Policy  
Concerning Foreign Research Reactor Spent Nuclear Fuel**

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: C.M. Seeno Phone: \_\_\_\_\_  
 Title and Organization: Concerned citizens  
 Address: P.O. Box 9377  
 City: Clayton State: CA Zip: 94517

**\*\*\* COMMENTS \*\*\***

I and my family are very much opposed to the proposed Nuclear Weapons Nonproliferation Policy Concerning Foreign Research Reactor Spent Nuclear Fuel. I feel that this area is much too densely populated to allow such a possible hazard. We feel this material should be stored in a remote area away from teens & cities. We fear what would happen if these reactors somehow were damaged - via an accident while transporting - terrorism or who knows what. We do not want this in our area. It is too dangerous.

Mr. Charles R. Head  
 Office of Spent Fuel Management, EM-37  
 U.S. Department of Energy  
 1000 Independence Avenue, SW  
 Washington, DC 20585-0001

**Response to Comment No. 128-1**

The commentor's opposition to the proposed action as described in Section 2.1 of the EIS is noted. Sections 2.2, 2.3 and 2.4 of the EIS describe each of the proposed management alternatives.

**Response to Comment No. 128-2**

The analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk of bringing foreign research reactor spent nuclear fuel through the Concord NWS, or any other of the ten ports selected, is low. The use of a remote port might slightly reduce the already low consequences of an accident, however, there are other considerations that also must be made when making port selection. Appendix D, Section D.1.9 of the EIS presents a complete discussion of the port selection process.

**Response to Comment No. 128-3**

The commentor's preference for storage only in remote areas is noted. The populations surrounding the five potential management sites under are listed in Table A-6 in Appendix A of the EIS.

**Response to Comment No. 128-4**

The commentor's opposition to any nuclear material being transported through the Concord area is noted. Sections 4.2.2 and 4.2.3 of the EIS, however, show that the risks of receiving the foreign research reactor spent nuclear fuel at Concord and transporting it by truck or rail would be low. Section D.5.9 has been added to Appendix D of the EIS to address the issue of attack by disgruntled persons or terrorists.

**SECTION 2.7: INDIVIDUALS**

**RK**

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**COMMENTOR No. 129: KIRKLAND, KIRK (Cont'd.)****RESPONSE TO COMMENT  
COMMENTOR No. 129: KIRKLAND, KIRK (Cont'd.)**

DOE's Radiological Assistance Program and under the National Contingency Plan, as well as through training, DOE sponsored meetings, informal discussions, and informational materials.

Appendix H, which was added to the final EIS in response to public comments, contains the general provisions for emergency preparedness and security measures associated with the transportation of foreign research reactor spent nuclear fuel in the United States. The provisions include an interface between DOE and interface.

***Response to Comment No. 129-5***

The analysis of impacts associated with an accident involving foreign research reactor spent nuclear fuel determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident (Section 4.2.2.3 and Appendix D, Section D.5 of the EIS).

***Response to Comment No. 129-6***

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE would be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel managed by DOE would be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

**COMMENTOR No. 129: KIRKLAND, KIRK (CONT'D.)**

**RESPONSE TO COMMENT  
COMMENTOR No. 129: KIRKLAND, KIRK (CONT'D.)**

***Response to Comment No. 129-7***

The commentor's statement that suggests that the foreign research reactor spent nuclear fuel elements are shipped in "uninspected containers" is incorrect. The spent nuclear fuel transportation casks are maintained and inspected according to the regulations and requirements dictated in the casks' certificate of compliance issued by the U.S. Department of Transportation. The shipper is responsible to ensure compliance with all requirements. In addition, the loading of the spent nuclear fuel elements in the transportation cask would be performed according to an inspection procedure detailed in a Transportation Plan provided by DOE and the process would be observed by a DOE representative. General provisions of the Transportation Plan are given in Appendix H of the EIS.

***Response to Comment No. 129-8***

The commentor's preference for Management Alternative 2, Subalternative 1a is noted. At-reactor storage for long periods of time, however, is often not feasible (Sections 2.3 and 4.4.1 of the EIS).

**RESPONSE TO COMMENT**  
**COMMENTOR No. 132: HERBERT, PAT**

o **Comment No. 132-1**

described in this comment is equivalent to Management Alternative 2. The described in more detail in Section 2.3 and the policy considerations and al impacts are presented in Section 4.4 of the EIS.

o **Comment No. 132-2**

itor's opposition to all forms of transport of all nuclear or hazardous waste noted. However, DOE would also like to point out that spent nuclear fuel have been carried out for over 40 years. During that period, there has never ent that has resulted in the breach of a spent nuclear fuel transportation cask use of radiological material from such a transportation cask. The EIS : that the risks from such activities are low (Sections 4.2.1, 4.2.2, and 4.2.3).

o **Comment No. 132-3**

inse to comment 132-2, above.

o **Comment No. 132-4**

In Section 1.1 of the EIS, the United States has not been leaving spent from fu .ign research reactors in foreign countries for years. Starting in the the United States began accepting spent nuclear fuel from foreign research ifically to prevent stockpiles of weapons-grade uranium abroad. It has only e policy for acceptance of HEU spent nuclear fuel expired in 1988 that spent has been left at the research reactors sites while DOE developed a new unagement of this spent nuclear fuel.

, the EIS specifically addresses the option of leaving the spent nuclear fuel untries (Management Alternative 2, Section 2.3 of the EIS). The EIS also advantages and disadvantages that would follow from implementation of /e.

o **Comment No. 132-5**

the cold war, Russia and other members of the former Soviet Union were ge inventory of weapons-grade fissionable material. The United States is er potential diversions of these materials to nuclear weapons programs and ns to reduce this inventory. Shipping spent nuclear fuel from foreign research ussia would increase this concern. In any case, overseas management of fuel from foreign research reactors is discussed in Section 2.3 of the EIS.

**COMMENTOR No. 134: PAWLOSKI, BERNARD J.**

**RESPONSE TO COMMENT  
COMMENTOR No. 134: PAWLOSKI, BERNARD J.**

Honorable Secretary  
Department of Energy  
U.S. Department of Energy  
Washington, D.C. 20585

Dear Mr. Secretary:

This letter is written to express the decision to send all NUCLEAR WASTE through the San Francisco Bay to the CONCORD NAVAL WEAPONS STATION for further distribution around our State and Federal Highways to places to contain such wastes.

What is our government thinking of? Don't they realize the connection areas that may well be putting in jeopardy just one little leak in the San Francisco Bay could contaminate the whole bay and affect millions of people!

Why can't this waste be initially sent to a port of entry that is more remote? The Concord Naval Weapons Station is enough of a threat to the greater Bay Area without the addition of NUCLEAR WASTE within its boundaries!

Please respond in writing as to why this decision cannot be changed and another location utilized.

PLEASE RECONSIDER THIS DECISION.

Sincerely,

Bernard J. Pawloski  
*Bernard J. Pawloski*  
B.J.P. #57  
Delta Club, Jr.  
95285

cc:  
President William Clinton  
Rep. John Doolittle  
Senator Barbara Boxer  
Senator Diane Feinstein  
Governor Pete Wilson  
State Leg. David Knowles

\* This is the best available copy of this comment document.

**Response to Comment No. 134-1**

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

**Response to Comment No. 134-2**

Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. As stated in Section 2.6.2 of the EIS, in over four decades of shipments, no spent nuclear fuel transportation cask has ever released any of its contents (radioactive material) as the result of an accident. Spent nuclear fuel transportation casks passing through the Bay area to Concord NWS, or any other port or waterway, would not release their contents, because the foreign research reactor spent nuclear fuel is a solid metal fuel and it would be transported dry. A paragraph has been added to Section 4.2.2 of the EIS to make this point and to emphasize the no-impact nature of these shipments on air and water quality.

**Response to Comment No. 134-3**

The use of a remote port could slightly reduce the consequences of an accident which would be low, however, there are other considerations that also must be made when selecting a port. Appendix D, Section D.1.9 of the EIS presents a complete discussion of the port selection process.

**TOR No. 136: FORM LETTER B****RESPONSE TO COMMENT  
COMMENTOR No. 136: FORM LETTER B****STE Coming soon to a town near you!**Peace Post  
Box 1000  
10th Ave. S.  
Seattle U.S.A.

36-1

**Response to Comment No. 136-1**

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk of bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.



To:  
Mr. Charles Head  
Office of Spent Nuclear Fuel  
Management (EM-7)  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington DC 20585

SECTION 2.7: INDIVIDUALS

**COMMENTOR No. 136: FORM LETTER B**

***RESPONSE TO COMMENT  
COMMENTOR No. 136: FORM LETTER B***

Individuals submitting this form letter:

Anonymous    Goldberg, Ethel E.  
Anonymous    Gray, Jerri  
Anonymous    Gray, Walter  
Anonymous    Hall, Freya  
Anonymous    Harcott, Edita  
Anonymous    Hollander, Leonore D.  
Anonymous    Johnston, Candice  
Anonymous    Lvx, Orland  
Anonymous    Norton, Kurt  
Anonymous    Perry, Suzanne  
Axford, Roger W.    Rehm, Rush  
Baltzo, Andy    Rose, J.  
Berrean, Gina    Scheritz, Andrei  
Boehny, G. E. Matthe    Strickland  
Burkhardt, Leonard B.    Yurma, R.H.  
Demi, R.    Zwickel, Abe  
Detwiler, Winifred    Zwickel, Jean  
Dodge, Chris    Fletcher, Sonia

**COMMENTOR No. 142: ROGERS, ELEANOR****RESPONSE TO COMMENT  
COMMENTOR No. 142: ROGERS, ELEANOR**

June 7, 1995

Charles Head  
U.S. Dept. of Energy

Dear Sir,

I would like to object to the shipment of spent nuclear fuel to the Concord Naval Weapons Station in California. If fuel is a health risk and the thousands of people in this area should not be exposed to any accidental exposure.

Sincerely,

Eleanor Rogers  
1236 Walker #313  
Walnut Creek Ca  
94596

**Response to Comment No. 142-1**

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

**142-1**

SECTION 2.7: INDIVIDUALS

**RESPONSE TO COMMENT**  
**COMMENTOR No. 144: MINTON, MARY**

***use to Comment No. 144-1***

ent of the proposed action is to support U.S. nuclear weapons nonproliferation seeking to reduce, and eventually eliminate, the use of highly enriched (weapons uranium in civil programs worldwide (Section 1.2 of the EIS). Thus, the intent of ultant proposed policy is to remove as much U.S.-origin HEU as possible from ograms worldwide and give foreign research reactor operators time to convert actors to the use of LEU fuels and to make arrangements for disposition of their uclear fuel (Section 1.2 of the EIS). The commentor's opposition to the use of d NWS as a port of entry is noted.

**COMMENTOR No. 145: GANIO, EMILY****RESPONSE TO COMMENT  
COMMENTOR No. 145: GANIO, EMILY**

June 7/1995

Dear Mr. Head,

As a citizen of Contra Costa County I wish to voice my opposition to the DOE proposal to transport spent nuclear materials by rail from the Concord Naval Weapons Station. I wish I had an alternative solution - I feel they should be stored "safely" where they are presently located rather than putting fear into humanity by moving them all over the place.

We already have enough trouble with what already stands at Concord and what is going on at the Lawrence Lab. Reject my "no" vote in further transportation of this dangerous material.

Friendly Ganio,  
Emily Ganio  
1451 Sam Brugel Dr.  
Walnut Creek, Ca. 94546

**Response to Comment No. 145-1**

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

**Response to Comment No. 145-2**

Overseas storage is addressed in the EIS as Management Alternative 2. Subalternative 1a. The commentor's preference for this alternative is noted. This alternative is discussed in Sections 2.3 and 4.4.1 of the EIS.

**145-1**

**145-2**

**145-1  
(Cont'd.)**

**RESPONSE TO COMMENT**  
**COMMENTOR No. 146: MURRAY, MARGARET L.**

**COMMENTOR No. 146: MURRAY, MARGARET L.**

671 St. Paul Street  
 Walnut Creek, CA  
 94598  
 Washington, DC.

Dear Mrs. Head  
 I would like to thank the  
 Department of Energy's provide  
 details of backhauls, to  
 the people who live there.  
 The Concord weapons station

I would wonder the spent fuel  
 how long would the spent fuel  
 remain in Concord and how  
 it would be taken away  
 Is this an island in  
 the middle Pacific?

Margaret Murray  
 Margaret Murray

**Response to Comment No. 146-1**

The estimated health risks to the people who live near Concord NWS are presented in Sections 4.2.2 and 4.2.3 of the EIS. Further details are available in Appendices D and E.

**Response to Comment No. 146-2**

Under normal circumstances, the foreign research reactor spent nuclear fuel would remain at a port for only a few hours. In the event of a major disruption of ground transportation systems due to adverse weather, seismic activity, or other situation, DOE's goal is to minimize holding times at the ports and to provide safe transport of the spent nuclear fuel to its destination as quickly as possible.

**Response to Comment No. 146-3**

Management Alternative 2, which is discussed in Sections 2.3 and 4.4.1 of the EIS, is the alternative to accepting foreign research reactor spent nuclear fuel into the United States. This alternative does not specify where the spent nuclear fuel would be stored; just that it would not enter the United States. Thus, if the comment is referring to an isolated island that belongs to another country, the commentor's alternative is covered under Management Alternative 2.

If the comment is referring to an isolated island that is part of the territory of the United States (e.g. Johnston Atoll), then the foreign research reactor spent nuclear fuel would legally be entering the United States and this subject is covered under Management Alternative 1. A discussion has been inserted into Section 2.10 of the EIS to explain why this option is not feasible.

**RESPONSE TO COMMENT**

**COMMENTOR No. 146: MURRAY, MARGARET L.**

**COMMENTOR No. 147: SLUSER, BETSY****RESPONSE TO COMMENT  
COMMENTOR No. 147: SLUSER, BETSY**

**Written Comments on the Draft Environmental Impact Statement  
on a Proposed Nuclear Weapons Nonproliferation Policy  
Concerning Foreign Research Reactor Spent Nuclear Fuel**

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Betsy Sluser Phone: 510-825-0364  
 Title and Organization: \_\_\_\_\_  
 Address: 1525 Cigaret Ct.  
 City: Lancaster State: CA Zip: 93504

**\*\*\* COMMENTS \*\*\***

We are new parents and new residents of Concord. Had and known that spent nuclear fuel would be proposed to be stored in Concord, and should never have been moving here. There is no safe place to store this fuel. To consider storing hundreds of thousands of tons to this extremely dangerous radioactive material is reckless. I propose your find another community better able to handle this material.

**Response to Comment No. 147-1**

As explained in Section 2.6.5 of the EIS, the only sites considered in the EIS as candidate management sites for the foreign research reactor spent nuclear fuel were the Savannah River Site, the Idaho National Engineering Laboratory, the Hanford Site, the Nevada Test Site, and the Oak Ridge National Laboratory. Concord NWS is only being considered as a potential port of entry.

The potential impacts of managing the spent nuclear fuel are discussed in Section 4.2.4 of the EIS. The data presented demonstrate that the risk associated with spent nuclear fuel management is low.

**To Mail in Comments, Address Correspondence to:**

Mr. Charles R. Head  
 Office of Spent Fuel Management, EM-37  
 U.S. Department of Energy  
 1000 Independence Avenue, SW  
 Washington, DC 20585-0001

**I48: JENSEN, KURT & CAROL**

**RESPONSE TO COMMENT**  
**COMMENTOR No. 148: JENSEN, KURT & CAROL**

**Response to Comment No. 148-1**

The commentor's opposition to management of spent nuclear fuel from foreign research reactors in the United States is noted. Section 2.3 of the EIS demonstrates other alternatives considered for the implementation of the proposed action.

**Response to Comment No. 148-2**

Each port considered in the EIS has developed an Area Contingency Plan. This plan outlines response capabilities, procedures and authorities for responding to and recovering from hazardous material incidents. Additionally, DOE would provide assistance to local authorities to ensure that appropriate measures would be taken in the unlikely event of an accident. As part of this assistance, DOE's Radiological Assistance Program teams, from eight offices strategically located throughout the country, would be used to coordinate and to provide remediation assistance. This type of assistance and coordination would be specified in the Transportation Plan that would be prepared prior to any individual spent nuclear fuel shipment and coordinated with State and local officials. The general provisions of the Transportation Plan are included in Appendix H, which was added to the final EIS in response to public comments. The provisions include an interface between DOE and State, Tribal, and local authorities, prior to the implementation of the policy, for the identification and resolution of emergency management and security issues specific to the communities that would be affected.

**Response to Comment No. 148-3**

Estimates of radiological health effects presented in Section 4.2.3 of the EIS are based on conservative assumptions using representative truck and rail transportation routes from candidate ports to interim management sites, including consideration of traffic volumes and surrounding populations. Supporting detail for the calculations is given in Appendix E of the EIS. Radiological and non-radiological health effects were found to be low (Section 4.2 of the EIS).

**Response to Comment No. 148-4**

Neither acts of terrorism nor theft of materials by a determined group or individual can be completely precluded. However, proper security measures greatly reduce the risk of such actions. The security provisions are summarized in the new Appendix H of the EIS. This appendix presents the general provisions of the Transportation Plan, which is a document that would be prepared for each foreign research reactor spent nuclear fuel shipment to specify details of the transportation process, including security provisions in port and during transit.

**Response to Comment No. 148-5**

General radiological health effects are discussed in Section 4.1.3 and the specific health effects of the proposed action and alternatives are presented throughout Section 4 of the EIS.

Environmental Impact Statement  
 Nonproliferation Policy  
 Reactor Spent Nuclear Fuel

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 alternatively, you may mail your comments to  
 any follow-up information or any questions  
 us will also allow us to properly indicate the  
 response document. Thank you.

Phone: 510 743 - 0515

State: CA Zip: 94520

MENTS ...

taking foreign reactor fuel  
 we're rough at this stage  
 I plans have been developed.  
 we will be traveling these  
 lots of areas. It will most  
 probably vehicles in this area.  
 if the scenario is? like this  
 we work through - isn't uranium  
 across the nuclear studies

I48-1  
 I48-2  
 I48-3  
 I48-4  
 I48-5

will not be camouflaged  
 but the about the areas??  
 we are afraid officials that  
 we are supposed to be working  
 our for our interests.... I think  
 there is an question coming up -  
 we cannot while we fact comin

Signed,  
 Kurt and Carol Jensen!

**No. 149: GARDNER, EDWARD**

**RESPONSE TO COMMENT**  
**COMMENTOR No. 149: GARDNER, EDWARD**

Environmental Impact Statement  
 Posse Nonproliferation Policy  
 Reactor Spent Nuclear Fuel

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Phone: 501-686-1837

Stanbury, Dickerson, Herk, Lutz, and Law

State \_\_\_\_\_ City \_\_\_\_\_ Zip \_\_\_\_\_

VENTS ...

the time of life in ten years  
any time in recent years  
cars, gas, home, medical, shopping  
business - it has been three  
days or less than one day occur  
- Once or more times) or the  
- 100% steel ocean liner  
The average 20 ton container  
On 200 at all times nearly to  
5. Stocked & stocked storage & ground  
Explosion after since we only way  
we do big major accident  
order total (explosion) is By (Chicago)  
B. Chicago (flying - it comes the  
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which flies like this many over  
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with them. Around all of  
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Rounds report we only fly over 200

**Response to Comment No. 149-1**

As the result of public concern borne from a September 1993 television report, the Contra Costa County Board of Supervisors initiated an investigation of the safety at Concord NWS. Their report on the subject, "Safety at the Concord NWS" dated November 2, 1993, concluded in part that: "There were no incidents involving explosions or radiation exposure. Many of the reported incidents were not accidents caused by Weapons Station employees but, rather, were discoveries by employees that materials being received had been damaged during loading or transit. In some cases the shipments had not been properly blocked, braced or banded."

In fact, the safety record at Concord NWS is significantly better than that of similar activities in ports in the private sector. According to the Department of Labor statistics, for the category of marine cargo handling, the number of lost workday cases per 100 full-time workers for 1993 was 7.1 nationwide (1994 data not available), which is typical. The number of lost workday cases per 100 workers at Concord NWS for the first three quarters of fiscal year 1995 was 5.3, which is also typical for Concord.

Transportation casks are designed and built to withstand significant punishment without releasing their contents (Section 2.6.2 of the EIS). Therefore, a seismic event, even if it caused structures at Concord NWS to fail, is not expected to compromise the spent nuclear fuel transportation cask.

Overall, the analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

**SECTION 2.7: INDIVIDUALS**

**NSE TO COMMENT  
D: GARDNER, EDWARD (CONT'D.)**

**P-2**

In the Concord NWS and Contra Costa County which in an accident. The Station has a Disaster Preparedness Agreement between the Naval Weapons Station and terms of the agreement each party is to immediately which presents an imminent danger. A similar mutual the Station and the County Fire Protection District.

The final EIS in response to public comments, contains cy preparedness and security measures associated with ch reactor spent nuclear fuel in the United States. The between DOE and State, Tribal, and local authorities, policy, for the identification and resolution of emergency specific to the communities that would be affected. These ring of first emergency responders. Funding for special ressed during this interface.

**COMMENTOR No. 149: GARDNER, EDWARD (CONT'D.)****RESPONSE TO COMMENT****COMMENTOR No. 149: GARDNER, EDWARD (CONT'D.)*****Response to Comment No. 149-2***

149.2

DOE is aware of agreements between the Concord NWS and Contra Costa County which would be followed in the case of an accident. The Station has a Disaster Preparedness Plan which includes a Mutual Aid Agreement between the Naval Weapons Station and Contra Costa County. Under the terms of the agreement each party is to immediately notify the other of any emergency which presents an imminent danger. A similar mutual aid agreement also exists between the Station and the County Fire Protection District.

Appendix H, which was added to the final EIS in response to public comments, contains the general provisions for emergency preparedness and security measures associated with the transportation of foreign research reactor spent nuclear fuel in the United States. The provisions include an interface between DOE and State, Tribal, and local authorities, prior to the implementation of the policy, for the identification and resolution of emergency management and security issues specific to the communities that would be affected. These issues include capabilities and training of first emergency responders. Funding for special needs, if necessary, would be addressed during this interface.

*We may have no emergency plan or  
such emergency. It goes beside  
they do not to see it in  
writing — for chance /*

*✓  
JTS & Another  
Troyer —*

**COMMENTOR No. 150: HOEKWATER, TRICIA**

**RESPONSE TO COMMENT**  
**COMMENTOR No. 150: HOEKWATER, TRICIA**

Written Comments on the Draft Environmental Impact Statement  
 on a Proposed Nuclear Weapons Nonproliferation Policy  
 Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thankyou.

Name TRICIA HOEKWATER Phone 510/370-3472 Day  
 Title and Organization Alton Bust/Discovery Toys  
 Address 2131 Chaperone Place  
 City Pittsburg State CA Zip 94565

**...COMMENTS...**

I do not want nuclear fuel of any type housed in  
 the area I live surrounding Pittsburg (Alameda County).  
 Particularly, the city of Concord. Concord is a  
 growing family city and this poses a real threat  
 to ourselves and our children. As a resident of  
 Pittsburg I spend a lot of time in Concord.  
 As well as daily travel to/ from work via highway 4.  
 Right past the Naval weapons station.  
 I will fight this proposal and I have the support  
 of my community and co-workers

**Response to Comment No. 150-1**

As explained in Section 2.6.5 of the EIS, the only sites which DOE is considering as locations for management of the foreign research reactor spent nuclear fuel are the Savannah River Site, the Idaho National Engineering Laboratory, the Hanford Site, the Nevada Test Site, and the Oak Ridge National Laboratory. Concord NWS is only being considered as a potential port of entry.

The potential impacts of managing the spent nuclear fuel are discussed in Section 4.4 of the EIS. The data presented demonstrate that the risk associated with the spent nuclear fuel management is low.

**To Mail in Comments, Address Correspondence to:**

Mr. Charles R. Head  
 Office of Spent Fuel Management, EM-37  
 U.S. Department of Energy  
 1000 Independence Avenue, SW  
 Washington, DC 20585-0001

**RESPONSE TO COMMENT**  
**COMMENTOR No. 151: GARDNER, W.B.**

**COMMENTOR No. 151: GARDNER, W.B.**

**Written Comments on the Draft Environmental Impact Statement  
on a Proposed Nuclear Weapons Nonproliferation Policy  
Concerning Foreign Research Reactor Spent Nuclear Fuel**

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: W. B. Gardner Phone: 510 - 614-1940  
Title and Organization: \_\_\_\_\_  
Address: 2624 Grafignani Ct  
City: Oakland State Ca Zip 94520

**\*\*\* COMMENTS \*\*\***

This type of operation should be conducted  
in a city of moderate size. B-2 micromines  
Cities should be located in non port cities.  
Such would pose a great risk to a broad population  
area although, being plant and reactor as there  
in the risk.

**Response to Comment No. 151-I**

The analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel through the Concord NWS, or any other port analyzed in the EIS, is low. The use of a remote port might slightly reduce the already low consequences of an accident, however there are other considerations that also must be made when making port selection. Appendix D, Section D.1.9 of the EIS presents a complete discussion of the port selection process.

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head  
Office of Spent Fuel Management, EM-37  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-0001

RES E.

S are presented in  
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ment of hazardous  
; the responsibility  
officials.

would be prepared  
cord NWS (or any  
a consultation with  
sportation process  
rform all required  
hat is expected of

escribed in Section  
tion and analysis to

**COMMENTOR No. 153: CLARK, LOUISE H.**

**RESPONSE TO COMMENT  
COMMENTOR No. 153: CLARK, LOUISE H.**

Louise Harvey Clark  
6 Blackthorn Road  
Lafayette, CA 94549  
(510) 299-0980

June 6, 1995

Charles Head, Program Manager  
Office of spent Nuclear Fuel Management (EM-37)  
FAX: 202-586-5256

Dear Mr. Head,

I understand that the Department of Energy intends to return spent nuclear fuel rods through the Concord Naval Weapons Station. I understand that these toxic materials will be moved along our city streets and freeways. Have you experienced these freeways? Has anyone ever told you that they were safe for our local drivers much less, proposed drivers of highly toxic materials? I would like you to address the traffic count and accident rates on these freeways before you consider adding to them, trucks with highly toxic cargo.

I live a stone's throw from one of these freeways. My grandchildren live three miles away, also a stone's throw from one of those freeways. Would you want your grandchildren exposed to such potential hazards?

I look forward to hearing your answers to my questions.

Sincerely,

*Louise H. Clark*

Louise H. Clark

**Response to Comment No. 153-1**

The frequency of accidents on highways has been taken into account in all ground transport risk estimates in the EIS. As discussed in Section 4.2.3 and Appendix E of the EIS, spent nuclear fuel has been transported along highways, railways, and waterways for over four decades without release of the radioactive contents from the spent nuclear fuel transportation cask, even as a result of an accident.

**Response to Comment No. 153-2**

Sections 4.2 and 4.5 of the EIS discuss the risks and consequences of transporting foreign research reactor spent nuclear fuel, and demonstrate that the risks would be low to persons located near a port, transportation route, or a management site.

**153-1**

**153-2**

***RESPONSE TO COMMENT  
MENTOR No. 154: CUTTER, BETTY LOU***

***Comment No. 154-1***

Story of HEU at foreign research reactors is a concern because portions diverted to weapons programs. The intent of the proposed action is to cur weapons nonproliferation policy seeking to reduce, and eventually of highly enriched (weapons-grade) uranium in civil programs worldwide (e EIS). Conversion of foreign research reactors to other sources of lar or wind power is not feasible because the alternate sources of energy he neutrons required for the research, medical, commercial, and lls of these reactors (Section 1.1 of the EIS).

***Comment No. 154-2***

ction 4.2.2.3 of the EIS on impacts associated with an accident involving reactor spent nuclear fuel determined that no decontamination, redemnation of property would result from the worst plausible accident. to comment 107-9 for a discussion of the impacts of Buchanan Field f foreign research reactor spent nuclear fuel at Concord NWS.

straints of the passage from San Francisco Bay to Concord NWS were t of the port selection process. The passage, although it passes near ries, does meet the requirements of Criterion 2 (Favorable Transit From the port selection (Appendix D, Section D.1.9.2 of the EIS). port and surrounding areas is also a consideration of the port selection ultation criterion for port selection (Criterion 5) is discussed in more D, Section D.1.9.5 of the EIS.

**SECTION 2.7: INDIVIDUALS**

**MARIO**

ent nuclear fuel through  
er, analysis in Sections  
ing spent nuclear fuel  
f the ports analyzed in

**COMMENTOR No. 156: GANDY, STEVE****RESPONSE TO COMMENT  
COMMENTOR No. 156: GANDY, STEVE**

**Written Comments on the Draft Environmental Impact Statement  
on a Proposed Nuclear Weapons Nonproliferation Policy  
Concerning Foreign Research Reactor Spent Nuclear Fuel**

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: STEVE GANDY Phone: 510-697-9522  
 Title and Organization: PRIVATE US CITIZEN  
 Address: 205 SUGAR ST.  
 City: CHICO State: CA Zip: 95920

**\*\*\* COMMENTS \*\*\***

THIS AREA SHOULD NOT BE CONSIDERED  
FOR THIS PROGRAM. IT IS A SPARSE POPULATION  
REGION TO RISK SAFETY OF A GREAT NUMBER  
OF PEOPLE SINCE THERE ARE PROBLEMS IN  
THE REGION. ALSO THERE ARE NEIGHBORHOOD  
HOUSES TOO CLOSE TO THIS PROPOSED ACTIVITY.  
IF THIS PROGRAM MUST BE APPROVED BY THE  
A REMOTE LESS POPULATED REGION NOT NEAR  
HOMES CAN BE FOUND. THE REGULATION IS TOO  
STUPID AS MUCH TIME AS POSSIBLE IS SPENT INVESTIGATING  
THE PROPOSED SITE. THERE SHOULD BE NO RUSH TO  
FIND A SITE NOW THAT THIS IS NOT THE APPROPRIATE REGION

To Mail in Comment, Address Correspondence to:

Mr. Charles R. Head  
 Office of Spent Fuel Management, EM-37  
 U.S. Department of Energy  
 1000 Independence Avenue, SW  
 Washington, DC 20585-0001

**Response to Comment No. 156-1**

Concord NWS was one of ten ports that was determined to be acceptable to receive the foreign research reactor spent nuclear fuel, if the material is to be accepted by the United States. Population of the port, surrounding areas to a radius of 10 miles, and the population along the transportation routes were considered in the port selection criteria. The population around Concord and on the routes to the management sites was low enough to qualify Concord NWS as an acceptable port. The population criterion for port selection (Criterion 5) is discussed in more detail in Appendix D, Section D.1.9.5 of the EIS.

**Response to Comment No. 156-2**

The analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel through the Concord NWS, or any other port analyzed in the EIS, is low. The use of a remote port might slightly reduce the already low consequences of an accident, however there are other considerations that also must be made when making port selection. Appendix D, Section D.1.9 of the EIS presents a complete discussion of the port selection process. DOE considered 161 ports (153 commercial and eight military ports) as ports of entry for foreign research reactor spent nuclear fuel. These ports were evaluated against selection criteria, resulting in 10 ports that met all of the criteria as being acceptable for the receipt and handling of foreign research reactor spent nuclear fuel. Appendix D, Sections D.1.8 and D.1.9 present a detailed discussion of the process and results.

## SECTION 2.7: INDIVIDUALS

57: STENNICK, JOHN

**RESPONSE TO COMMENT**  
**COMMENTOR No. 157: STENNICK, JOHN**

High-level radioactive waste from countries Japan, Australia, Canada, Sweden, Switzerland, etc. In my opinion, these countries are not part of the "Third World". These guys should be held accountable for a wrong spent fuel and absurd plan for the storage of this highly toxic waste within our own borders. The DOE is planning to use normal highways for the transportation of this irradiated waste. Traffic and shipping accidents are likely and could result in fires, storage cracks are our only protection that waste that may be headed up our rivers and down our highways very soon. Hanford is not an acceptable site for the storage of even more high-level waste. In Hanford already has a leaking storage alongside the Columbia River. This is the likelihood of our region and must be ruined by nuclear contamination.

### **Response to Comment No. 157-1**

The commentor's opposition to the following alternatives is noted: a) acceptance of spent nuclear fuel from countries other than third world countries, b) use of normal shipping lanes, highways, and rail lines for transportation of spent nuclear fuel, and c) use of the Hanford Site for management of spent nuclear fuel from foreign research reactors. As discussed in Sections 1.2 and 2.2 of the EIS, one alternative under consideration is to accept such spent nuclear fuel from developed and developing countries for a limited period of time. The intent of this proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS). The analysis given in Section 4 of the EIS indicates that radiological health risks and environmental effects resulting from the proposed action and management alternatives would be low.

The selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

**COMMENTOR No. 163: WHITING, MARCUS****RESPONSE TO COMMENT  
COMMENTOR No. 163: WHITING, MARCUS**

To: Mr. Ivan Salin  
Chairman  
Nuclear Regulatory Commission  
Washington, D.C. 20585

Name: Marcus Whiting  
340 - 4th Avenue  
San Francisco, CA 94118

Re: NO! to Foreign Nuclear Waste Storage at Hanford, Washington

Dear Chairman Salin,

I am writing in opposition to plant being made to store nuclear waste from foreign countries (e.g., North Korea) at the Hanford Nuclear Reservation in Washington State.

I believe, It is entirely unacceptable to import radioactive nuclear waste products from a foreign country and bury them under the ground at Hanford, Washington.

I have summarized my thoughts on this subject into two categories:

- a) Political
- b) Environmental

*Political*

The thought of "bargaining" with North Korean officials to acquire (buy?) their nuclear waste and store it in the United States in order to further pursue them to reduce their nuclear arms program is, in my opinion, a feeble-minded, unrealistic policy. I imagine this concept is being implemented in conjunction with other means of bargaining in a broad attempt to make the North Koreans conform to international concerns, but I believe it is ill-conceived and unacceptable.

To address the range of a potential threat of North Korean nuclear proliferation and, through a shared type of political metamorphosis, transcribe the ownership and custodianship of thus nation's nuclear waste over to us and literally deposit it at the feet of your constituents here in the United States is unreasonable in this heart. We certainly didn't ask for this nor do we have the technology or ability to deal with it safely, efficiently or permanently.

To manifest and advocate policies which propagate the use of nuclear energy, and thereby exacerbate the huge problem of nuclear waste, is irresponsible and unshying with the safety and survival needs of all living things on this planet.

**Response to Comment No. 163-1**

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

**Response to Comment No. 163-2**

DOE is not negotiating with North Korea to accept its spent nuclear fuel. If foreign research reactor spent nuclear fuel is accepted into the U.S., then aluminum-based and TRIGA reactor spent nuclear fuel elements from South Korean research reactors would be accepted for disposition (Tables 2-1 and 2-2 of the EIS).

**Response to Comment No. 163-3**

The proposed action is to adopt a policy to manage spent nuclear fuel from foreign research reactors in 41 foreign nations, which includes South Korea, but not North Korea (Section 2.2.1.3 of the EIS). Section 2.6.5 describes storage technologies for spent nuclear fuel.

163-1

163-2

163-3

**SECTION 2.7: INDIVIDUALS**

**RESPONSE TO COMMENT**

**COMMENTOR No. 163: WHITING, MARCUS (CONT'D.)**

**Response to Comment No. 163-4**

Discussed in Section 4.2.3 and Appendix E of the EIS, spent nuclear fuel has been transported safely along highways, railways, and waterways for over four decades. Impacts of ultimate disposition of spent nuclear fuel are discussed qualitatively in Section 4.2.7 of the EIS. DOE is currently evaluating the feasibility of construction of a disposal site at Yucca Mountain, NV. In the meantime, support for U.S. nuclear weapons proliferation policy requires DOE and the Department of State to consider other means along with the foreign research reactor spent nuclear fuel (Section 1.1 of the EIS). As indicated in Sections 2.1 and 4.2.7 of the EIS, if a geologic repository is not prepared to accept the foreign research reactor spent nuclear fuel or its resultant stable waste forms generated due to chemical separation or other processing technology) DOE would have to manage the material in existing facilities at the DOE management site(s).

**RESPONSE TO COMMENT  
RENTOR No. 169: FORM LETTER C**

***nt No. 169-1***

dition to bringing foreign research reactor spent nuclear fuel through noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS associated with bringing spent nuclear fuel to the Concord NWS, analyzed in the EIS, is low.

***nt No. 169-2***

ess that determined that Concord NWS was an acceptable port of the port and surrounding areas. Appendix D, Section D.1.9.5 of the "population" criterion. In regard to the number of refineries along the route to Concord NWS, the passage from San Francisco meets the requirements of Criterion 2 (Favorable Transit From Selection (Appendix D, Section D.1.9.2 of the EIS). The population in open ocean are not the only considerations in selecting ports of research reactor spent nuclear fuel, if it is accepted into the United States such as population along the route to the management site, handling containers, and port facilities would also be considered in in of ports of entry. Appendix D, Section D.1.9 of the EIS presents

dioactive material from a foreign research reactor spent nuclear as the result of a seismic event is low. Transportation casks are withstand significant punishment without releasing their contents IS). Therefore, a seismic event, even if it caused structures at is not expected to compromise the transportation cask. Further, associated with accidents involving foreign research reactor spent in Section 4.2.2.3 of the EIS demonstrates that the use of any of not pose significant risk to port personnel or the population near /S has considerable relevant experience in handling containers, safely handle containerized foreign research reactor spent nuclear on D.1.9.1 of the EIS).

***nt No. 169-3***

l health effects presented in Section 4.2.3 of the EIS are based on ns using representative truck and rail transportation routes from m management sites, including consideration of traffic volumes tions. Supporting detail for the calculations is given in Appendix zed and non-radiological health effects of the proposed action and s were found to be low.

SECTION 2.7: INDIVIDUALS

*RESPONSE TO COMMENT*  
No. 169: FORM LETTER C (CONT'D.)

**COMMENTOR No. 196: ANONYMOUS**

**RESPONSE TO COMMENT**  
**COMMENTOR No. 196: ANONYMOUS**

women in the San Francisco Bay area  
 have 50 times the  
 amount of breast cancer  
 as other women. Citizens  
 in Contra Costa County have  
 DEPT OF ENERGY  
 HAZEL O'LEARY  
 1390 higher incidence  
 of cancer. Your plan to  
 transport/store nuclear  
 waste in Concord  
 CALIFORNIA COASTLINE AND THE  
 LONE CYPRESS  
 NO WISARD PEOPLE THAT THE GOVT


**Response to Comment No. 196-1**

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

196-1

**COMMENTOR No. 201: TURNER, DOUG**

**RESPONSE TO COMMENT**  
**COMMENTOR No. 201: TURNER, DOUG**

**Written Comments on the Draft Environmental Impact Statement  
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 Concerning Foreign Research Reactor Spent Nuclear Fuel**

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Name: Doug Turner Phone: \_\_\_\_\_  
 Title and Organization: \_\_\_\_\_  
 Address: 1201 Tuskegee Dr  
 City: Bethesda State: MD Zip: 20830

\*\*\* COMMENTS \*\*\*

*I suggest the aging of interim storage facilities should be limited to a maximum of 20 years. Any fuel retained to the U.S. should be managed as determined in the EIS for the DEDS by spent nuclear fuel. The fuel that is retained, should be processed and the fissile material should be removed.*

**Response to Comment No. 201-1**

The commentor's support for accepting and managing foreign research reactor spent nuclear fuel in the United States (Management Alternative 1 or 3; Sections 2.2 and 2.4 of the EIS, respectively) is noted.

**Response to Comment No. 201-2**

The commentor's support for the chemical separation alternative is noted. This is Implementation Alternative 6 to Management Alternative 1, which is discussed in Sections 2.2.2.6 and 4.3.6 of the EIS.

To Mail in Comments, Address Correspondence to:

Mr. Charles B. Head  
 Office of Spent Fuel Management, EM-37  
 U.S. Department of Energy  
 1000 Independence Avenue, SW  
 Washington, DC 20585-0001

All comments are due by June 20, 1995, and those received by that date will be considered by DOE in preparation of the final EIS. Comments received after the close of the comment period will be considered to be outside practicable.

**12: WORTHINGTON, MARJORIE****RESPONSE TO COMMENT  
COMMENTOR No. 202: WORTHINGTON, MARJORIE*****Response to Comment No. 202-1***

The commentor's opposition to accepting foreign research reactor spent nuclear fuel from nations that pose no proliferation risk, where the spent nuclear fuel is LEU, and from nations where dry storage is feasible, is noted.

The United States has played in the past, and continues to play, a leadership role in the world community in matters of nuclear weapons nonproliferation. In this role it initiated programs such as the Reduced Enrichment for Research and Test Reactors (RERTR) program and encouraged other nations to support it. Some of the nations which have supported it such as Britain, France, Japan, Sweden and others may not currently present the nuclear weapons proliferation risk as others. The reasons for considering these nations under this policy are included in Section 1.3 of the EIS.

As discussed in Section 1.1 of the EIS, the reason for including LEU in the policy is that the United States has offered LEU acceptance as an enticement for foreign research reactor operators to convert from HEU to LEU fuel use. The enticement was necessary because operation with LEU fuel is not as effective as with HEU fuel. Also, as explained in Section 2.3 of the EIS, the opportunities for expanded spent nuclear fuel storage at foreign research reactor sites are limited or nonexistent.

**202-1*****Response to Comment No. 202-2***

The commentor's opposition to the use of commercial freighters and public ports is noted. Estimated risks during marine transport and at candidate ports were found to be low (Sections 4.2.1 and 4.2.2 of the EIS).

**202-2*****Response to Comment No. 202-3***

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

to the concerns of citizens in the Pacific High-Level Nuclear Wastes using com-ts, where there is a very real danger to n wastes? (Shipboard fires, offloading, rays, etc.)  
in the following areas:  
nations that do not pose a proliferation  
stes that can not be used in bombs  
storage is feasible and would allow for  
cial freighters or public ports (instead  
d DOD ports), to protect longshore  
oads, and the public in the event of

Nuclear Wastes for storage at Hanford!  
anford as a viable storage area is totally  
fuel cooling basins along the Columbia  
subject to massive failure in case of an  
wastes should not be accepted here when  
funding of proper safety measures for  
Ford K-Basin. Other nations must pay the  
and bear responsibility for environmental  
ution to these re-gests.  
Marjorie Worthington

**202-3**

**RESPONSE TO COMMENT  
COMMENTOR No. 203: THOMAS, TAMLYN**

**TAMLYN**

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***Response to Comment No. 203-1***

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

***Response to Comment No. 203-2***

As discussed in Section 2.2.1.2 and 2.2.2.3 of the EIS, several financing options have been considered, ranging from collection of fees from the research reactor operators that would pay all of the costs of the program to full subsidization of the program by DOE. One of these options would be for developed countries (which represent about 87 percent of the spent nuclear fuel total mass and about 78 percent of the spent nuclear fuel elements) to pay a competitive fee for U.S. management of their spent nuclear fuel. This fee would be based on, among other things, the charges these countries would incur for the most realistic alternatives available to them, e.g., reprocessing at a facility in Dounreay, Scotland. Also, under the basic implementation, DOE would subsidize the costs of managing the spent nuclear fuel from developing countries. The United States does not believe the developing countries can afford to pay the expense for spent nuclear fuel management either in the United States or in the host country. Additionally, many countries accepted U.S. supplies of HEU (and avoided developing their own enrichment or reprocessing programs) specifically because they expected the United States to accept the spent nuclear fuel.

**203-1**

**203-2**

**COMMENT NO. 203: THOMAS, TAMYLN (CONT'D.)****RESPONSE TO COMMENT****COMMENT NO. 203: THOMAS, TAMYLN (CONT'D.)**

~~203.2~~ i emergency training in  
events , spills and evacuation.  
> pay for specialized areas & of  
the public port system to  
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nd a place within their own  
e the waste & when they do not  
with their own citizens' protests  
of such nuclear waste storage.

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**Response to Comment No. 203-3**

The analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel through the Port of Tacoma, or any of the other selected ports, is low. The use of a remote port might slightly reduce the consequences of an accident which would be low (Section 4.2.2 of the EIS), however, there are other considerations that also must be made when making port selection. Appendix D, Section D.1.9 of the EIS presents a complete discussion of the port selection process.

All shipments of radioactive material are tightly regulated. Internationally the International Atomic Energy Agency (part of the United Nations) and the International Maritime Organization regulate such shipments. In the United States, the U.S. Department of Transportation, DOE, and the NRC all have regulations and rules that apply to these shipments. Section 5 of the EIS provides a detailed description of the applicable laws, regulations and other requirements.

**Response to Comment No. 203-4**

If foreign research reactor spent nuclear fuel were accepted into the United States, it would only be done for a limited period of time. The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide. The intent of the resultant proposed policy, therefore, is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS). Foreign research reactors are on notice that once the acceptance policy has lapsed, their spent nuclear fuel would no longer be accepted for disposition in the United States (final paragraph of Section 1.2).

**Response to Comment No. 203-5**

Spent nuclear fuel from foreign research reactors has been accepted into the United States for over three decades without incident (Section 4.3.2 of the EIS). Several thousand transcontinental shipments of spent nuclear fuel have been conducted during that time. No transportation cask containing spent nuclear fuel has ever been stolen or released its radioactive contents, including casks involved in traffic accidents.

**TAMLYN (Cont'd.)**

**RESPONSE TO COMMENT  
COMMENTOR No. 203: THOMAS, TAMLYN (Cont'd.)**

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**203-5  
(Cont'd.)**

**203-6**

**203-1  
(Cont'd.)**

*James*  
5

Consideration of solar and wind power are outside the scope of this EIS. However, it should be noted that as part of its mission, DOE currently has on-going programs that are seeking to develop and promote use of these alternative energy sources.

**Response to Comment No. 203-6**

ACK

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aste Management  
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all of the aluminum  
will be managed at  
arch reactor spent  
tional Engineering  
l would be shipped

## **SECTION 2.7: INDIVIDUALS**

### **IMENT 4DE, MARIANNE**

th reactor spent nuclear fuel through Sections 4.2.2 and 4.5 of the EIS nuclear fuel to the Port of Tacoma,

earch reactor spent nuclear fuel is in commercial or chartered ships come overland). If commercial unchanged because the commercial fuel would call at Tacoma whether nt nuclear fuel. If chartered ships e to Tacoma, Tacoma's ship traffic (186 shipments spread over 13 low as one ship every four months.

EIS, including comments received le final EIS.

ors. Research reactors play a vital d applications, and also provide a rs are a vital tool in cancer therapy ctores have also been used in the

**RESPONSE TO COMMENT**  
**COMMENTOR No. 208: RAMUS, EVELYN**

***Response to Comment No. 208-1***

The commentor's opposition to the acceptance and management of foreign research reactor spent nuclear fuel in the United States is noted. The intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly enriched (weapons-grade) uranium in civil programs worldwide (Section 1.2 of the EIS).

***Response to Comment No. 208-2***

The commentor's preference for the option of each country managing its own spent nuclear fuel is noted. This could be either Management Alternative 2 or the No Action Alternative, which are described in Sections 2.3 and 2.5, respectively. The policy considerations and environmental impacts of these two alternatives are discussed in Sections 4.4 and 4.6 of the EIS.

***Response to Comment No. 208-3***

Explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was issued on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-clad foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

***Response to Comment No. 208-4***

Sections 2.2.1.2 and 2.2.2.3 of the EIS discuss alternative financing arrangements that range from charging the foreign research reactor operators a fee that would cover all the costs of the proposed action, to having DOE subsidize all of the reactor operators' costs. The compromise position that is evaluated is to charge developed countries a competitive fee, while developing countries would be subsidized. If less than the full cost of the proposed action is charged to the foreign reactor operators, the difference would be the net to the United States of gaining participation by other countries in our nuclear weapons proliferation programs.

SECTION 2.7: INDIVIDUALS

ONSE TO COMMENT  
No. 209: BICKETT, GARY

19-1

In the EIS, the selection of the site or sites at which the spent nuclear fuel would be managed is based on the analysis in the Idaho Spent Nuclear Fuel Management and Idaho Environmental Restoration and Waste Management Statement. The Record of Decision for this EIS was issued with this Record of Decision, all of the aluminum spent nuclear fuel managed by DOE will be managed at South Carolina. Any other foreign research reactor spent DE will be managed at the Idaho National Engineering and Research Reactor spent nuclear fuel would be shipped

19-2

ceping foreign research reactor spent nuclear fuel from risk is noted. The United States has played in the past, role within the world community in matters of nuclear its role, it initiated programs such as the Reduced St. Reactors (RERTR) program and encouraged other nations which have supported it such as Britain, France, currently present the same nuclear weapons proliferation is for considering these nations under this policy are

**RESPONSE TO COMMENT  
COMMENTOR No. 211: QUINN, PATRICIA**

***Response to Comment No. 211-1***

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

The port selection process that determined that Concord NWS was an acceptable port considered the population of the port and surrounding areas. Appendix D, Section D.1.9.5 of the EIS provides an explanation of the "population" criterion. Despite the presence of fisheries along the route to Concord NWS, the passage from San Francisco Bay to Concord does meet the requirements of Criterion 2 (Favorable Transit From Open Ocean) for the port selection (Appendix D, Section D.1.9.2 of the EIS). The population and favorable transit from open ocean are not the only considerations in selecting ports of entry for the foreign research reactor spent nuclear fuel, if it is accepted into the United States. Other items include population along the route to the management site, port experience with handling containers, and port facilities. Appendix D, Section D.1.9 of the EIS provides details of the port selection process.

The risk of releasing radioactive material from a spent nuclear fuel transportation cask as a result of a seismic event is low. Transportation casks are designed and built to withstand significant punishment without releasing their contents (Section 2.6.2 of the EIS). Therefore, a seismic event, even if it caused structures at Concord NWS to fail, is not expected to compromise the transportation cask.

**COMMENTOR No. 212: THOMAS FAMILY**

**RESPONSE TO COMMENT**  
**COMMENTOR No. 212: THOMAS FAMILY**

50% unbleached pulp and 50% post-consumer fibre paper

June 5, 1995

Charles Head, Program Manager  
 Office of Spent Nuclear Fuel Management  
 Department of Energy  
 1000 Independence Avenue, SW  
 Washington, DC 20585

Dear Mr. Head,

We are opposed to any shipment of nuclear material through the San Francisco Bay area into CNWS for the following reasons.

-There is no data to show that a fuel cask can survive a prolonged fire such as in an oil fire or cargo ship fire.

-There is no permanent storage site in the US. The temporarily stored material will have to be moved again.

-There is no guarantee that fuel in these rods will not be separated for bomb use by the US.

The DOE does not have a consistent policy in regards to nonproliferation. Nonproliferation is achieved when no nuclear material is being produced. This means no HEU, LEU or nuclear power. All have the potential for diversion to weapons or terrorism. We do not want to live with the continued threat of nuclear material being produced and moved around. STOP THE PRODUCTION.

Require the countries that are producing this material to properly store it. Most of the countries especially our western allies can do this. Take special precautions with those countries with which there is concern of theft or diversion.

Sincerely,  
*John S. Thomas*  
 Thomas Family

147 St. German Lane  
 Pleasant Hill, CA. 94523

**Response to Comment No. 212-1**

The regulations governing the design and construction of "Type B" casks such as would be used to transport the foreign research reactor spent nuclear fuel requires them to withstand a high intensity, engineered fire for 30 minutes (Appendix B, Section B.2). Real life tests have been conducted to determine the accuracy of the techniques used to demonstrate compliance with this regulatory requirement. Further, examinations of real life fires on land and at sea, and fire tests have demonstrated that high intensity fires are very unlikely to be sustained for lengthy periods, and even then not in a single location.

In respect to the impact a ship fire might have on a spent nuclear fuel transportation cask, there are three facts that would mitigate the potential damage. First, ship fires tend to move to different areas of the ship as the combustible material is consumed, so the cask would not be exposed for the entire duration of the fire. Second, a ship fires intensity is normally limited by the amount of oxygen that can reach the interior of a hold. Third, all ships that would be used to transport foreign research reactor spent nuclear fuel have built-in fire suppression equipment, which at a minimum would keep fires well below the extreme temperatures needed to damage the transportation cask. For these reasons, it would be almost impossible for the spent nuclear fuel inside the transportation cask to reach 900 degrees Kelvin (1,160 degrees F), the melting point of research reactor spent nuclear fuel. The probability of reaching such a temperature was calculated to be less than one in a billion (Attachment D5 to Appendix D of the EIS). To put this temperature into perspective, steel used in a ships structure buckles at around 700 degrees Kelvin (800 degrees F).

Nevertheless, in spite of the improbability of such fires, the EIS contains the results of an analysis of such a fire (Section 4.2.1.3 of the EIS). The results of the analyses are given in Appendix D of the EIS.

**Response to Comment No. 212-2**

The impacts of ultimate disposition of the foreign research reactor spent nuclear fuel are discussed qualitatively in Section 4.2.7 of the EIS. A detailed, quantitative discussion of these impacts would have to be the subject of future NEPA documentation.

**Response to Comment No. 212-3**

As stated in Section 2.2.6 of the EIS, the United States does not conduct chemical separation in support of nuclear weapons construction. If a policy to use chemical separation is adopted, the preferred option would be to blend HEU down to LEU to

*(CONT'D.)*

- 2 use of LEU fuel in
- 3 it cannot be used to
- 4 instead of HEU for
- 5 nations in order to
- 6 ul benefits of nuclear
- 7 m (Section 1.1 of the

ge is noted. This is  
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rch reactor operators

the RERTR program  
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ess stable countries.

**COMMENTOR No. 217: RAINWATER, DAN**

**RESPONSE TO COMMENT**  
**COMMENTOR No. 217: RAINWATER, DAN**

Written Comments on the Draft Environmental Impact Statement  
 on a Proposed Nuclear Weapons Nonproliferation Policy  
 Concerning Foreign Research Reactor Spent Nuclear Fuel

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: DAN Rainwater Phone: 6895297  
 Title and Organization: Resident  
 Address: 55 Norman Ave  
 City: Clyde State CA Zip 94520

\*\*\* COMMENTS \*\*\*

I do NOT want your Nuclear  
waste transported by my home!

*Response to Comment No. 217-1*

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head  
 Office of Spent Fuel Management, EM-37  
 U.S. Department of Energy  
 1000 Independence Avenue, SW  
 Washington, DC 20585-0001

**RESPONSE TO COMMENT**  
**COMMENTOR No. 218: JACOBSON, DENISE**

**COMMENTOR No. 218: JACOBSON, DENISE**

**Written Comments on the Draft Environmental Impact Statement  
on a Proposed Nuclear Weapons Nonproliferation Policy  
Concerning Foreign Research Reactor Spent Nuclear Fuel**

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Denise Jacobson Phone: (503) 281-9594  
Title and Organization: \_\_\_\_\_  
Address: 306 DE 14th Ave  
City: Portland State OR Zip 97222

\*\*\* COMMENTS \*\*\*

I am unequivocally opposed to the planned ship  
spent fuel rods from nuclear reactors  
to the U.S. for processing and storage. The U.S.  
provides much less security than Japan does so  
there are far better sites by opposite end world  
the U.S. should not be used to store  
in "dry casks" their spent fuel rods.  
We can tell the U.S. does not yet need a major  
to deal with the Nevada and other  
victims of the missile contamination there.  
With all the other facilities available,  
the U.S. and Japan are

Please focus your attention  
on clean up of existing  
waste and stop plutonium  
further nuclear development  
for peace or war.

**Response to Comment No. 218-1**

The commentor's opposition to the acceptance and management of foreign research reactor spent nuclear fuel in the United States is noted. Sections 2.3, 2.5, and 4.4 of the EIS describe other alternatives under consideration.

**Response to Comment No. 218-2**

The commentor's preference for the alternative of overseas storage is noted. This is Management Alternative 2, Subalternative 1a, which is discussed in Section 2.3 and 4.4.1 of the EIS.

**Response to Comment No. 218-3**

As discussed in Section 2.1, the intent of the proposed action is to support U.S. nuclear weapons nonproliferation policy seeking to reduce, and eventually eliminate, the use of highly-enriched (weapons grade) uranium in civil programs worldwide (Section 1.2 of the EIS). DOE does not consider that these objectives promote further nuclear development. The cleanup of contamination at certain sites which resulted from nuclear weapons development is independent from the proposed action in this EIS. The environmental impacts from management of foreign research reactor spent nuclear fuel at the proposed management sites are discussed in Sections 4.2 and 4.4 and Appendix F, Section F.4 of the EIS.

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head  
Office of Spent Fuel Management, EM-37  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-0001

## SECTION 2.7: INDIVIDUALS

*SEE TO COMMENT  
219: PEELE, ROBERT*

"ed alternative" in the draft EIS. DOE's preferred version of the EIS (Sections 2.9 and 4.7). The first Alternative 1 as described in Section 2.2 is noted. Published stringent limitations on the export of HEU content of this Act into law, no new export licenses have

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10-year policy refers to the period of generation of war fuel, the amount of which can be reasonably id be made for a period of 13 years. The additional ling of the fuel generated towards the end of the s. The commentator's preference for an even longer

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ic chemical separation is noted. This alternative is of the EIS. It is also part of Management Alternative and 5.5 of the EIS.

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EIS, the storage technology identified for the basic mative 1 is dry storage. The commentator's support

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ign research reactor spent nuclear fuel should not he Idaho National Engineering Laboratory or the rted to another site is noted.

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ing the West Bear Creek site at Oak Ridge is noted.

**RESPONSE TO COMMENT  
COMMENTOR No. 219: PEELE, ROBERT (Cont'd.)**

**PEELE, ROBERT (Cont'd.)**

[redacted]  
[redacted] adjacent site is controlled so a buffer could likely [redacted]  
[redacted] emphasis on the number of kg [redacted] ed, and the number of kg [redacted] analysis, it would seem [redacted] is the simplest pertinent [redacted] be estimated, tabulated, [redacted] values for each overseas [redacted]

**219-6  
(Cont'd.)**

**Response to Comment No. 219-7**

The use of decay power is an alternative approach, but does not provide a clear indication of what is involved in spent nuclear fuel management or, especially, the transport of the fuel. The commentor's approach would not respond to public concerns over the number of elements, the amount of HEU removed from civilian commerce, or the number of shipments to and through the United States.

**Response to Comment No. 219-8**

Although the approach that the commentor has suggested is a real life evaluation, it would not change the results of the impact analysis and its accuracy would depend upon the quality of reactor specific information. The commentor's interpretation of the EIS's approach is correct. Appendix B of the EIS clearly states the assumptions and reasons that were used for the estimation of radionuclide inventories in different types of fuel. For impact analysis purposes, one can not use the average or actual values from one reactor to another, but rather needs to determine the maximum values in order to bound the consequences. DOE agrees with the commentor that the approach used in the EIS produces very conservative results.

**Response to Comment No. 219-9**

Section 3.3.4.9 of the EIS has been corrected. The correction does not influence the socioeconomic analysis in the EIS.

**Response to Comment No. 219-10**

The commentor's support for management of spent nuclear fuel from foreign research reactor's in the United States is noted.

Sincerely,  
*R. Peele*  
Robert Peele  
Phone or fax (615) 483-8974

**COMMENTOR No. 220: BUTLER, JOEL****RESPONSE to COMMENT  
COMMENTOR No. 220: BUTLER, JOEL****Written Comments on the Draft Environmental Impact Statement  
on a Proposed Nuclear Weapons Nonproliferation Policy  
Concerning Foreign Research Reactor Spent Nuclear Fuel**

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: JOEL BUTLER Phone: 510-687-3224  
 Title and Organization: Senate Liaison  
 Address: 4325 N. Cache Beach Ct  
 City: Concord State CA Zip 94521

**\*\*\* COMMENTS \*\*\***

A copy of my letter of 4 June 1995 addressed to  
The Concord City Council is attached.  
I attended the May Forum at Concord Center  
but the opposition was forcefully vocal and  
opportunity to comment was not given - at least  
for any supportive views.

All of us must become informed, involved  
and seek out best ways to separate our  
Government in any peace-related endeavor.  
Good luck with this report.

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head  
 Office of Spent Fuel Management, EM-37  
 U.S. Department of Energy  
 1000 Independence Avenue, SW  
 Washington, DC 20585-0001

SECTION 2.7: INDIVIDUALS

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**RESPONSE TO COMMENT  
COMMENTOR No. 220: BUTLER, JOEL (CONT'D.)**

**COMMENTOR No. 220: BUTLER, JOEL (CONT'D.)**

It seems to me to be the trend and if it is, I urge the Council to look favorably on this proposal.  
I urge you to hear all concerns, to weigh them carefully as you consider your position on this matter.  
Thank you for reading my concerns.

|| 220-1  
(Cont'd.)

Sincerely,  
  
Joel Butler

MENT  
TZ, SHIRLEY A.

h reactor spent nuclear fuel through sections 4.2.2 and 4.5 of the EIS nuclear fuel to the Port of Tacoma, the environmental effects evaluated ecological impacts to any of the section 4.2.2). Spent nuclear fuel release of radioactive material. To shipments, no radioactive materials transportation cask as a result of an

**o. 237: LANTZ, SHIRLEY A. (CONT'D.)****RESPONSE TO COMMENT  
COMMENTOR No. 237: LANTZ, SHIRLEY A. (CONT'D.)**

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the water way will be endangered  
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Would we be endangered  
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Release of radiation exposure  
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**237.2****Response to Comment No. 237-2**

The analysis in Sections 4.2.2 and 4.5 of the EIS indicates the risk to humans and wildlife associated with the shipment of foreign research reactor spent nuclear fuel through any of the ports, is low.

**Response to Comment No. 237-3**

In many instances, the perception by the public of the risk associated with acceptance of foreign research reactor spent nuclear fuel may be greater than the actual risk, or the risk from other even more hazardous activities. However, such adverse impacts have not been observed during the almost 30 years over which foreign research reactor spent nuclear fuel was accepted into the United States in the past. Under NEPA regulations, the socioeconomic effects evaluated for this EIS do not include those associated with psychological fear of receiving foreign research reactor spent nuclear fuel.

**Response to Comment No. 237-4**

The risk of radiation releases is low, as shown in Section 4 of the EIS; there is no possibility of a nuclear explosion from the proposed action; the potential for lack of funding is outside the scope of this EIS; the threat from terrorists would be reduced by accepting this material into the U.S. because in this case the terrorists could not make a bomb out of it; the possibility of earthquakes was taken into account in the EIS; and the subject of union bargaining is also outside the scope of this EIS.

**237.3****237.4**

**EW A. (Cont'd.)****RESPONSE TO COMMENT  
COMMENTOR No. 237: LANTZ, SHIRLEY A. (Cont'd.)****237-4**  
**(Cont'd.)**

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dangerous  
car waste  
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**237-5**

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is to

**Response to Comment No. 237-5**

The commentor's preference for the option of each country managing its own spent nuclear fuel is noted. This could be either Management Alternative 2 or the No Action Alternative, which are described in Sections 2.3 and 2.5 of the EIS, respectively. The policy considerations and environmental impacts of these two alternatives are discussed in Sections 4.4 and 4.6 of the EIS.

SECTION 2.7: INDIVIDUALS

**COMMENTOR No. 237: LANTZ, SHIRLEY A. (CONT'D.)**

- 4 -

**RESPONSE TO COMMENT**

**COMMENTOR No. 237: LANTZ, SHIRLEY A. (CONT'D.)**

receive the High-Level Nuclear problem  
by letting all those European countries  
who have more money now than we do  
first do Japan, Scotland etc etc  
do their own dirty Hot Nuclear  
destruction in their own countries!

237-5  
(Cont'd.)

Shirley A. Lantz

**0. 238: REDLER, JAY & VIRGINIA****RESPONSE TO COMMENT  
COMMENTOR No. 238: REDLER, JAY & VIRGINIA****Re Draft Environmental Impact Statement  
Non Weapons Nonproliferation Policy  
Research Reactor Spent Nuclear Fuel**

Comments, please feel free to use this page and drop it in the mail. Alternatively, you may mail your comments to the address listed below. Also, please provide us with your phone number for any follow-up information or any questions you may have. This will also allow us to properly indicate the comment response document. Thank you.

Virginia Office Phone: 672-5916  
or consider of CCIA Board  
page

State VA Zip 24520

**\* COMMENTS \*\*\***

I feel that we do not  
want to our back yard  
and another storage to take  
elsewhere

238-I

The commentator's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low. If the foreign research reactor spent nuclear fuel is accepted into the United States (Management Alternative 1 or 3) there would be no storage of this material at Concord NWS, any other port, or anyplace except for DOE management sites. Under normal circumstances, it would remain at a port for only a few hours. In the event of a major disruption of ground transportation systems due to adverse weather, seismic activity, or other situation, DOE's goal is to minimize holding times at the ports and to provide safe transport of the spent nuclear fuel to its destination as quickly as possible.

encl 1c:

EPA-37

**SECTION 2.7: INDIVIDUALS**

**o COMMENT  
?: BLOMBERG, CRAIG**

and management of foreign research reactor stated. Sections 2.3, 2.5, and 4.4 of the EIS tion. Based on the environmental impact S, the risk to the environment and the health piance and management of foreign research s is low.

each country managing its own spent nuclear it Alternative 2 or the No Action Alternative, 2.5 of the EIS, respectively. The policy of these two alternatives are discussed in

designed and built to preclude release of contents have ever been released from a EIS, while the port accident probabilities The analysis in the EIS indicates that the 4.2.2.3).

ign research reactor spent nuclear fuel are EIS. DOE is currently evaluating the Yucca Mountain, NV. In the meantime, on policy requires DOE and the Department the foreign research reactor spent nuclear

Waste Policy Act, as amended, that DOE disposal of spent nuclear fuel and high- erations are protected from any hazards. e the Yucca Mountain Site to determine if the commentor's request for an executive formation packet "Nevada and the Yucca address.

**COMMENTOR No. 242: CLARK, BARBARA****RESPONSE TO COMMENT  
COMMENTOR No. 242: CLARK, BARBARA**

P.O. Box 1222  
Walla Walla, WA 99362  
June 13, 1995

Segment EM-37

Leave SH  
D

***Response to Comment No. 242-1***

The commentor's qualified support for Management Alternative 3, the hybrid alternative, is noted. Management Alternative 3 is described in Section 2.4 of the EIS.

***Response to Comment No. 242-2***

The commentor's opposition to accepting foreign research reactor spent nuclear fuel from nations that pose no proliferation risk, where the spent nuclear fuel is LEU, and from nations where dry storage is feasible is noted.

The United States has in the past, and continues to play a leadership role in the world community in matters of nuclear weapons nonproliferation. In this role it initiated programs such as the Reduced Enrichment for Research and Test Reactors (RERTR) program and encouraged other nations to support it. Some of the nations which have supported it such as Britain, France, Japan, Sweden and others may not currently present the nuclear weapons proliferation risk as others. The reasons for considering these nations under this policy are included in Section 1.2 of the EIS.

As discussed in Section 1.1 of the EIS, the reason for including LEU in the policy is that the United States has offered LEU acceptance as an enticement for foreign research reactor operators to convert from HEU to LEU fuel use. The enticement was necessary because operation with LEU fuel is not as effective as with HEU fuel. Also, as explained in Section 2.3 of the EIS, the opportunities for expanded spent nuclear fuel storage at foreign research reactor sites are limited or nonexistent.

***Response to Comment No. 242-3***

The commentor's opposition to the use of commercial transport and public ports is noted. Estimated risks for marine transport, at candidate ports and along transportation routes were found to be low (Sections 4.2.1, 4.2.2, and 4.2.3 of the EIS, respectively).

***Response to Comment No. 242-4***

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent

and any of the hearings on the DEIS and ask  
ments be included in the record.  
int to select Alternative 3, the combination,  
istes generated by foreign research reactors.  
nuclear technology requires acceptance of  
extremely dangerous wastes which are part of

importing of wastes from those countries  
proliferation risk. There should be no  
site from any country. And there should be  
h level waste where it is feasible to provide  
th international inspection. Those who use  
ld bear the costs and risks. Further, it is  
t to increase the inherent risks associated  
ts by adding the risks of transportation

rcumstances, where importing to the US  
this should not be done through public ports  
hicles. (This presumably leaves military  
c and questionable as it is, it would be  
e taxpayers have subsidized the nuclear industry  
ur money\*) it is wrong that we be further  
to safety risks above what we already endure

rd cleanup of the wastes already on the site  
c and questionable as it is, it would be  
d more high-level waste to the site. Hanford  
ton DC, but it's not far from those of us who  
want a safe life for our children.

nt of Energy will soon recognize that the costs  
ers are much less with solar and other renewable  
hey are with nuclear and will begin a rapid  
bsidy of the nuclear industry.

**242-1**

**242-2**

**242-3**

**242-4**

**242-5**

**COMMENTOR No. 242: CLARK, BARBARA (CONT'D.)**

**RESPONSE TO COMMENT  
COMMENTOR No. 242: CLARK, BARBARA (CONT'D.)**

nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

***Response to Comment No. 242-5***

Costs and risks of solar and other renewable technologies are outside the scope of this EIS. However, as part of its mission, DOE currently has on-going programs that are seeking to develop and promote use of these alternative energy sources, such as solar and wind.

EDWIN C.

spent nuclear fuel through  
and 4.5 of the EIS indicates  
Concord NWS, or to any of

ed into the United States  
this material in the Port of  
ment sites. Under normal  
rs. In the event of a major  
eather, seismic activity, or  
e ports and to provide safe  
as possible.

g foreign research reactor  
iction, or condemnation of  
on 4.2.2.3 of the EIS). The  
of the transportation cask.  
at the cask is violated and  
would not be present in the  
re than the sabotage case.  
tage would jeopardize the

**COMMENTOR No. 244: McSPADDEN, CAROLYN**

**RESPONSE TO COMMENT**  
**COMMENTOR No. 244: McSPADDEN, CAROLYN**

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Written Comments on the Draft Environmental Impact Statement  
 on a Proposed Nuclear Weapons Nonproliferation Policy  
 Concerning Foreign Research Reactor Spent Nuclear Fuel

you would like to give us written comments, please feel free to use this page and drop it at the registration table when you leave. Alternatively, you may mail your comments to: Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Carolyn McSpadden Phone: 703-656-2705  
 Name and Organization: Friends of the Public Interest Teacher  
 Address: 4722 Antelope Valley Dr.  
 City: Lanham State: Md. Zip: 20706

\*\*\* COMMENTS \*\*\*

As a member of the several groups I have met regarding the C.R.D., but based upon what I understand of the issue as stated in the letter of this page, I want to make it known that I would like to have the H.E.U. returned to the United States. I feel this is preferable to leaving it in foreign countries, where it can easily and fall into the wrong hands, and be used against us & certainly put the D.O.C. to handle this material, and surely fly ab so over foreign governments.

Wall in Comment, Address Correspondence to:

Linerly  
Carolyn McSpadden  
 Mr. Charles R. Head  
 Office of Spent Fuel Management, EM-37  
 U.S. Department of Energy  
 100 Independence Avenue, SW  
 Washington, DC 20585-0001

I'd appreciate the opportunity to later speak on the matter.

Comments are due by June 20, 1995, and those received by that date will be considered by DOE in preparation of the final EIS. Comments received after the close of the comment period will be considered to extent practicable.

**Response to Comment No. 244-1**

The commentor's support for Management Alternative 1, as described in Section 2.2 of the EIS, is noted.

**COMMENTOR No. 245: CHRISTWITZ, BARBARA****RESPONSE TO COMMENT  
COMMENTOR No. 245: CHRISTWITZ, BARBARA**

6/15/95      The U.S. for storage ~~through~~  
 Concord Naval Weapons Base.  
 2 New B is a very  
poor choice for many  
 reasons, but chiefly  
 because of its high  
 population, numerous  
 pipelines, and 7 oil  
 refineries in the Carguass  
 straits alone, with 240+ ships  
 loaded of petroleum products  
 a year in the Bay. An  
 accident would be catastrophic.

Dear Mr. Head:  
 Please carefully  
 consider my comment  
 regarding DOE's plan  
 to bring spent nuclear fuel  
 from foreign reactors into

Thank you for your  
 attention to this matter.  
 Sincerely,  
 Barbara Christwitz

**Response to Comment No. 245-1**

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low.

**245-1**

The port selection process that determined that Concord NWS was an acceptable port considered the population of the port and surrounding areas. Appendix D, Section D.1.9.5 presents an explanation of the "population" criterion. Despite the existence of refineries and bridges along the route to Concord NWS, the passage from San Francisco Bay to Concord does meet the qualitative requirements of Criterion 2 (Favorable Transit From Open Ocean) for the port selection (Appendix D, Section D.1.9.2 of the EIS). The volume or size of the local marine traffic (present or future) was not considered in the calculation of risk associated with the shipment of foreign research reactor spent nuclear fuel. In general, the number of ship mishaps is not proportional to the amount of ship traffic because port ship traffic is slow, and even when heavy, is normally a small number of ships per hour. Historically, increasing the volume does not significantly increase the probability of an accident. Rather, the number of ship mishaps is associated with navigational hazards and distances from the port to the open ocean or a large bay (port selection Criterion 2; Appendix D, Section D.1.9.2 of the EIS). Appendix D, Section D.5.3.1.3 of the EIS presents a discussion of the determination of the probability of ship accidents used in the EIS. The population and favorable transit from open ocean are not the only considerations in selecting ports of entry for the foreign research reactor spent nuclear fuel, if it is accepted into the United States. Other items of importance include population along the route to the management site, port experience with handling containers, and port facilities. Appendix D, Section D.1.9 of the EIS presents details of the port selection process.

SECTION 2.7: INDIVIDUALS

MARY C.

ant nuclear fuel through  
2.2 and 4.5 of the EIS  
the Port of Charleston,

zen into account in the  
ound to be low. This  
he EIS.

VSE TO COMMENT  
247: PAUL, CLARENCE L.

.1

of the foreign research reactor spent nuclear fuel are 2.7 of the EIS. A detailed, quantitative discussion of subject of future NEPA documentation. As stated in f a geologic repository is not prepared to accept the ar fuel or its resultant stable waste forms (generated ccessing technology) DOE would continue to manage the DOE management site(s).

.2

EIS, the selection of the site or sites at which the ar fuel would be managed is based on the analysis in imatic Spent Nuclear Fuel Management and Idaho nvironmental Restoration and Waste Management tement. The Record of Decision for this EIS was nce with this Record of Decision, all of the aluminum nuclear fuel managed by DOE will be managed at Carolina. Any other foreign research reactor spent will be managed at the Idaho National Engineering research reactor spent nuclear fuel would be shipped

.3

erseas storage in a remote location is noted. Under native 1a (Section 2.3 of the EIS), the United States operators in storing their spent nuclear fuel in their outside of the United States. The disadvantages of costs of constructing suitable storage facilities and remote areas. This option would leave a concentrated s-grade) uranium outside of the United States. From iproliferation, it is less risky to provide for disposition es. As demonstrated by the analysis in Section 4 of plementation of the proposed action to human health

**COMMENTOR No. 249: PENCE, ALISON****RESPONSE TO COMMENT  
COMMENTOR No. 249: PENCE, ALISON**

**Alison Pence**  
222 27th Street  
San Francisco, CA 94107

Mr. Charles Head  
Office of Spent Nuclear Fuel Mgt. (EM-37)  
U.S. DOE  
1000 Independence Ave., SW  
Washington DC 20585

June 12, 1995

Dear Mr. Head:

I am responding to the proposal that would transport nuclear waste through Concord. I attended the hearing held in Concord on May 22, 1995 and join in the chorus of residents and bay area citizens who think, for many reasons, radioactive material should be transported and stored elsewhere. My primary concern is that the Bay Area is heavily populated and seismically active. If, as you said, "a container just fell off a truck," getting it back on the truck and through passable roads would not be a high priority after an earthquake. It has been six years since the '89 quake and some freeways are still closed!

You yourself said that in the big EIR (not just for foreign fuel), the recommendation is to have waste received either in South Carolina or in Washington state.

I think that if you ship to this side of the U.S. at all, you should send shipments to Washington. They are closer to Idaho than we are, they have experience with nuclear elements and they might welcome the work. As you know, the community here is hostile towards your proposal.

Sincerely,  
*Alison Pence*  
Alison Pence

**Response to Comment No. 249-1**

The population within a 50-mile radius of the Concord NWS was considered when analyzing the potential impact of a range of hypothetical port accidents. The risks were found to be low (Appendix D, Section D.5 of the EIS). Earthquakes were not analyzed separately in the EIS because seismic activity would not result in greater damage to a transportation cask than that caused by a ship collision and subsequent fire. Rather, the consequences from the worst plausible accidents involving foreign research reactor spent nuclear fuel transportation casks were evaluated, regardless of what initiated them. An earthquake could be the initiator of either a ship or road accident, and thus affect the probability of such accidents; however, the number of earthquake-induced ship and road accidents is small compared to other causes.

**Response to Comment No. 249-2**

As stated in the May 30, 1995 Record of Decision for the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement, aluminum-based foreign research reactor spent nuclear fuel will be managed at the Savannah River Site. Any other foreign research reactor spent nuclear fuel will be managed at the Idaho National Engineering Laboratory.

**Response to Comment No. 249-3**

The distance from the port to the management site is only one of the considerations in selecting potential ports of entry for the foreign research reactor spent nuclear fuel. Other considerations such as port population, route population, port experience with handling containers, and access to the ocean would be considered in making the final selection of port of entry. Appendix D, Section D.1.9 of the EIS presents details of the port selection process.

3 COLLEEN

ear fuel through  
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Concord NWS,

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to provide safe  
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Foreign research  
is to remove as  
nd give foreign  
EU fuels and to  
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is alternative is

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action (storage,  
lisisposal, etc.) at  
; would require  
many countries  
some countries,  
t nuclear fuel in  
; less costly and

## SECTION 2.7: INDIVIDUALS

**IMENT  
ZIEN, RAYMOND J.**

n process are discussed in Section  
ort route options were analyzed in  
eign research reactor spent nuclear  
ection 4.2.3 of the EIS. In all cases

ted with population (Criterion 5), a  
dix D, Section D.1.9.5 of the EIS).  
adius around the port. The analysis  
sign research reactor spent nuclear  
or condemnation of property would  
2.3 of the EIS). Regardless of the  
port would bear a disproportionate  
nd 4.5 of the EIS indicates that the  
e Concord NWS, or to any of the  
fected individuals.

illed to more than 1,500 people and  
on and purpose was advertised in  
also provided to local radio stations  
ment was included in the Federal  
rs were provided for preregistration

898 which directs federal agencies  
verse environmental effects of their  
income populations. Environmental  
ted and found to have no significant  
n, including minority populations  
VS or other candidate ports of entry  
f the EIS identifies low-income  
ion of resident minority populations  
t justice at candidate ports, along  
ent sites is discussed in Sections

COMMENTOR No. 251: O'BRIEN, RAYMOND J. (Cont'd.)

***RESPONSE TO COMMENT***

***COMMENTOR No. 251: O'BRIEN, RAYMOND J. (Cont'd.)***

page 2  
To: Mr. C. Head  
6/13/95

I hope that you will find these concerns relevant, and trust that they will be addressed in your Final Environmental Impact Statement.

Sincerely,

  
Raymond J. O'Brien

COMMENTOR No. 252: McGOWAN, Tom**RESPONSE TO COMMENT**  
**COMMENTOR No. 252: McGOWAN, Tom****Written Comments on the Draft Environmental Impact Statement  
on a Proposed Nuclear Weapons Nonproliferation Policy  
Concerning Foreign Research Reactor Spent Nuclear Fuel**

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Tom McGowan Phone: (702) 382-9745 (am)  
 Title and Organization: Individual MEMBER of the Public  
 Address: 720 S. CASINO CENTER BLVD., #5  
 City: LAS VEGAS State: Nev Zip: 89101

⑥ in Person:... (see other side)...

...COMMENTS...

- ①. The facilitator and both DMS/DOE assigned speakers were professional, dedicated, experienced, knowledgeable and responsive, answering my extremely effective present to their assigned audience.
- ②. The modified 'Gamble' Matrix and Diagram in Format 100 and Improvement upon Basic (non-improved) Technical Assistance ('last modified' Policy, not fully for start of an optimal one). Professional and productive policies and public meetings under genuine Public Commenter Development Process.
- ③. The enhanced effective alternative solution to the entire FAS/BDF Transition Complex, & promptly inclusion of associated Nuclear Non-Proliferation, is rapidly available for recommendation and proposal. If necessary, to Mail in Comments, Address Correspondence to: Directorate, you may do so directly via notification, or through your agency representative, via Office of Spent Fuel Management, EM-37 of the Secretary of Energy, Washington, DC 20585-0001, Attn: Facility-Specific Policy, in Technical Review of All comments are due by June 20, 1995, and those received by that date will be considered by DOE in preparation of the final EIS. Comments received after the close of the comment period will be considered to the extent practicable.

**Response to Comment No. 252-I**

The commentor's support concerning the format used by DOE for the public hearings, the professionalism, responsiveness and courtesy of the facilitator and DOE representatives, and the United States nuclear weapons nonproliferation goals, is noted.

**252-I**

Mr. Charles R. Head  
 Office of Spent Fuel Management, EM-37 of the Secretary of Energy,  
 U.S. Department of Energy  
 1000 Independence Avenue, SW  
 Washington, DC 20585-0001  
Attn: Facility-Specific Policy, in Technical Review of All comments are due by June 20, 1995, and those received by that date will be considered by DOE in preparation of the final EIS. Comments received after the close of the comment period will be considered to the extent practicable.

④ THANKS FOR THE OFFICE, THE COOKIES, THE CIVICIAN COMMENTATOR, AND YOUR  
SINCERELY DEDICATED EFFORTS IN THE NUCLEAR PUBLIC INTEREST:  
—Tom McGowan

**RESPONSE TO COMMENT**  
**COMMENTOR No. 253: RAYMER, TERESA L.**

***use to Comment No. 253-1***

is 2.2.1.2 and 2.2.2.3 of the EIS discuss alternative financing arrangements that from charging the reactor operators a fee that would cover all the costs of the ed action, to having DOE subsidize all of the reactor operators' costs. One omise position that is evaluated is to charge developed countries a competitive fee, developing countries would be subsidized. If less than the full cost of the proposed is charged to the reactor operators, the difference would be the cost to the United of gaining participation by other countries in our nuclear weapons nonproliferation ns.

***use to Comment No. 253-2***

mentor's opposition to the use of Washington State is noted. However, it should d that the analyses provided in Section 4.2 of the EIS demonstrate that there e no significant adverse impacts to any of the water ways, ports, or highways that rial might pass through or near. Spent nuclear fuel transportation casks are d and built to preclude release of radioactive material. As stated in Section 2.6.2 EIS, to date, after more than 30 years experience in shipping, no spent nuclear fuel riation cask has ever released any of its contents (radioactive material), even in highway accidents. Based on this experience, DOE considers that spent nuclear nsportation casks passing through the Port of Tacoma, Washington State, or any rt or state, would not release their radioactive contents.

SECTION 2.7: INDIVIDUALS

**COMMENTOR No. 254: HERRMANN, ELIZABETH**

**RESPONSE TO COMMENT  
COMMENTOR No. 254: HERRMANN, ELIZABETH**

June 16, 1995

Secretary of Energy  
401 M Street S.E.  
Office of Spent Fuel Management  
EM-33 1000 Pennsylvania Ave. S.W.  
Washington D.C. 20585-0001

Dear Sir

I urge you to deny access to our country [REDACTED] 254.1  
as a storage option for nuclear wastes  
from other countries.

**Response to Comment No. 254.1**

The commentor's opposition to the management of foreign research reactor spent nuclear fuel in the United States is noted. In assessing the environmental and policy impacts of the proposed action, DOE has also considered and evaluated Management Alternative 2 which involves management of foreign research reactor spent nuclear fuel overseas. Management Alternative 2 is discussed in Section 2.3 of the EIS.

Yours truly,

Elizabeth Herrmann  
1013 NE 32nd Lane  
Vancouver, WA 98660

**COMMENTOR No. 256: YURMAN, RICH**

June 13 1995  
 Mr. Charles Head  
 Office of Spent Nuclear Fuel Management  
 DOE  
 Washington DC

Dear Mr. Head:

As a resident of the San Francisco Bay Area I am deeply concerned by DOE's plans to transport spent nuclear fuel from other countries via the Concord Naval Weapons Station to various sites in the U.S. This means transloads of the most dangerous toxic materials known will pass through one of the most highly populated areas of our country where an accident or derailment could put all of us in this area at grave risk. And this danger is compounded by CNS's long history of mishandling shipments and having major accidents. To help off all this the contaminated material, toxic for 250,000 years, cannot be stored safely anywhere on the planet.

Therefore I urge you, as the responsible official to recommend this project and cancel the use of CNS as a receiving station for transports nuclear waste in the form of spent nuclear fuel.

Thank you for your time & attention  
 Yours truly,  
 Rich Yurman

**RESPONSE TO COMMENT**  
**COMMENTOR No. 256: YURMAN, RICH**

**Response to Comment No. 256-1**

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Concord NWS is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Concord NWS, or to any of the ports analyzed in the EIS, is low. Not only is the risk low, but the analysis of impacts associated with an accident involving foreign research reactor spent nuclear fuel determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident (Section 4.2.2.3 of the EIS).

Regarding the commentor's concern about the population of the area, the port selection process that determined that Concord NWS was an acceptable port considered the population of the port and surrounding areas. Appendix D, Section D.1.9.5 of the EIS presents an explanation of the "population" criterion.

As the result of public concern borne from a September, 1993 television report, the Contra Costa County Board of Supervisors initiated an investigation of the safety at Concord NWS. Their report on the subject, "Safety at the Concord NWS" dated November 2, 1993, concluded in part, "There were no incidents involving explosions or radiation exposure. Many of the reported incidents were not accidents caused by Weapons Station employees but, rather, were discoveries by employees that materials being received had been damaged during loading or transit. In some cases the shipments had not been properly blocked, braced or banded."

In fact, the safety record at Concord NWS is significantly better than that of ports in the private sector with similar activities. According to the Department of Labor statistics, for the category of marine cargo handling, the number of lost workday cases per 100 full-time workers for 1993 was 7.1 nationwide (current data not available), which is typical. The number of lost workday cases per 100 workers at Concord NWS for the first three quarters of fiscal year 1995 was 5.3, which is also typical for Concord.

**Response to Comment No. 256-2**

It is true that some of the man-made nuclide in the spent nuclear fuel would be toxic for a long time (more than 250,000 years) similar to those found naturally in our environment. Both the man-made and naturally present toxic materials have been stored safely without undue harm to the public or the environment. In the case of man-made material, experience at the Savannah River Site has shown an excellent storage capability of foreign research reactor spent nuclear fuel type for more than 20 years. The research reactors, with the lifetime cores, keep the same fuel in the reactor pool for approximately 40 years. Others, as indicated in Appendix F, Section F.2.9 of the EIS, have experience in safe storage of spent nuclear fuel in dry storage for more than 30 years. DOE proposes to store the foreign research reactor spent nuclear fuel in dry storage after receipt and characterization of the spent nuclear fuel. The EIS concluded that the risks of storing the foreign research reactor spent nuclear fuel in dry storage at only of the potential management sites are low (Section 4.2.4, and Appendix F, Section F.4).

**256-1  
(Cont'd.)**

## SECTION 2.7: INDIVIDUALS

### VINCHESTER, ELLEN & JOHN

#### RESPONSE TO COMMENT COMMENTOR No. 257: VINCHESTER, ELLEN & JOHN

Winchester  
Winchester  
ado Drive  
FL 32304  
578-0864

June 15, 1995

##### **Response to Comment No. 257-1**

The United States has in the past and continues to play a leadership role in the world community in matters of nuclear weapons nonproliferation. In this role, it initiated programs such as the Reduced Enrichment for Research and Test Reactors (RERTR) program and encouraged other nations to support it. Some of the nations which have supported it such as Britain, France, Japan, Sweden and others may not currently present the same nuclear weapons proliferation risk as other nations. The reasons for considering these nations under this policy are included in Section 1.3 of the EIS.

##### **Response to Comment No. 257-2**

Management Alternative 3, described in Section 2.4 of the EIS, considers management of the spent nuclear fuel from foreign research reactors in the United States and overseas. As discussed in Section 2.10 of the EIS, it would be imprudent to publicly label selected nations as a proliferation risk because such designations are subjective and would likely lead to adverse political and diplomatic consequences. Many research reactor operators located in nations which are closely allied with the United States cannot, at this time, dispose of their own spent nuclear fuel in their country (Sections 1.1 and 1.2 of the EIS). Thus, the intent of the proposed policy is to remove as much U.S.-origin HEU as possible from civil programs worldwide and give foreign research reactor operators time to convert their reactors to the use of LEU fuels and to make arrangements for disposition of their LEU spent nuclear fuel (Section 1.2 of the EIS).

##### **Response to Comment No. 257-3**

The current lack of LEU reprocessing capability abroad applies to the new high-density LEU fuel which is made of a uranium-silicon-aluminum alloy. The commentator's emphasis on this reason for preferring the acceptance of foreign research reactor spent nuclear fuel into the U.S. is noted.

##### **Response to Comment No. 257-4**

The advantages and disadvantages of domestic chemical separation are discussed in Sections 2.2.2.6 and 4.3.6 of the EIS. It is included in the EIS because it is a reasonable alternative. Furthermore, it would not be necessary to store HEU under United Nations safeguards if it is blended down to LEU.

Ellen Winchester  
John Winchester  
Florida State University

COMMENT  
HOWE, DOROTHY

management of foreign research reactor  
Based on the environmental impact  
risk to the environment and the health  
management of foreign research reactor  
w.

search reactors in the United States is  
in the EIS (Sections 2.2 through 2.4).  
US nuclear weapons nonproliferation  
the use of highly enriched (weapons-  
ton 1.2 of the EIS).

for the United States to implement a  
from foreign research reactors (the  
States would assist with management  
paragraph of Section 1.2 of the EIS)  
incentive to complete their conversion  
wn means for dealing with their spent

tion of the site or sites at which the  
e managed is based on the analysis in  
uclear Fuel Management and Idaho  
Restoration and Waste Management  
Record of Decision for this EIS was  
ecord of Decision, all of the aluminum  
anaged by DOE will be managed at  
other foreign research reactor spent  
ed at the Idaho National Engineering  
or spent nuclear fuel would be shipped

## SECTION 2.7: INDIVIDUALS

### **RESPONSE TO COMMENT MENTOR No. 260: CALL, BETH**

#### **Comment No. 260-1**

Position to management of spent nuclear fuel from foreign research reactors in the United States, is noted. Spent nuclear fuel from foreign research reactors managed in the United States for nearly four decades (Section 1.1 of the EIS, Sections 4.5, and 4.5 of the EIS describe other alternatives under consideration.

#### **Comment No. 260-2**

In section 1.5 of the EIS, the selection of the site or sites at which the spent nuclear fuel would be managed is based on the analysis in the Energy Programmatic Spent Nuclear Fuel Management and Idaho Laboratory Environmental Restoration and Waste Management Environmental Impact Statement. The Record of Decision for this EIS was issued in 1995. In accordance with this Record of Decision, all of the aluminum reactor spent nuclear fuel managed by DOE will be managed at the Site in South Carolina. Any other foreign research reactor spent nuclear fuel managed by DOE will be managed at the Idaho National Engineering and Environmental Research Center. Accordingly, no foreign research reactor spent nuclear fuel would be shipped

#### **Comment No. 260-3**

Position to bringing foreign research reactor spent nuclear fuel through Tacoma, or Portland is noted. However, analysis in Sections 4.2.2 indicates that the risk associated with bringing foreign research reactor fuel through Puget Sound, Seattle, Tacoma or Portland, or to any of the ports is low. The analysis of impacts associated with an accident involving foreign spent nuclear fuel also determined that no decontamination, removal of property would result from the worst plausible accident (See EIS, "Consequences of Port Accidents").

#### **Comment No. 260-4**

Section 1.1 of 1992 contains provisions that bar essentially all exportation of spent nuclear fuel from the United States. Since passage of this Act, no new EU have been issued by the United States.

**SE TO COMMENT  
60: CALL, BETH (CONT'D.)**

5 e past and continues to assume a leadership role in nuclear weapons nonproliferation. In this role it used Enrichment for Research and Test Reactors other nations to support it. Some of the nations which present the nuclear weapons proliferation risk as these nations under this policy are included in Section

6 5, the reason for including LEU in the policy is that leptance as an enticement for foreign research reactor <sup>3</sup>U fuel use. The enticement was necessary because effective as with HEU fuel.

6

management Alternative 2, Subalternative 1a. The alternative is noted. This alternative is discussed in

7

ith accidents and incident-free operations involving ar fuel, which are presented in Sections 4.2.1 and the use of commercial ships would not pose any l or the population near the port for any of the ten teria (Criterion 5) evaluates the population of ports, s (Appendix D, Section D.1.9.5 of the EIS), as the

8

ver are outside the scope of this EIS. However, it sion DOE currently has on-going programs that are of these alternative energy sources.

COMMENTOR No. 267: BERGER, HEDY

**RESPONSE TO COMMENT**  
**COMMENTOR No. 267: BERGER, HEDY**

---

Re: Concord Nuclear Weapons Station; Nuclear Fuel Plan  
 From: Hedy Berger  
 To: 1557 Franklin  
 SF CA 94109  
 Financial citizen  
 Phone/Fax  
 CHSS 492-5554

Dear U.S. Department of Energy,

As a response for your environmental report I hope you include my concern for the underlying reasons the plan to appropriate nuclear fuel from the world suggests. One simply doesn't see why one branch of government supports the creation of poison while another branch is required to hide it. One logically concludes that the poison is worth more to create and hide than not to create and not to hide. In all fairness, one might consider it correct to hide poison in and of itself as an absolute principle with the purpose of preventing it from those who would administer it to an innocent life form. On the other hand one would conclude that this is not the principle which is being made sacred in fact, it is this principle which is being desecrated since it is the same body hiding it which has dishonored it. It is in a similar way that one might conclude how there has been the desecration of the principle of the environment, or what one might call the harmony of indigenous life forms. Certainly this principle cannot be nourished by the same mouth which says a moratorium of laws regarding biological ascendence, one might further conclude that letters such as the one has been asked to write for the purpose of the environmental report is going to be useless towards its proposed purpose. Contrary to threat, this decision technology builds suspicion. One finds the request of the commentary perverse, like being asked by the perpetrators to write a list of the risks between the death sentence of the world and the death sentence of a place within that world, as if the list would be long enough eventually, to call a wrong a right, having forgotten the eradication of contamination creators, and having forgotten the common knowledge of it meaning nothing if anyone exposed, because anything can be exposed, so long as it's worth it (Supposedly) to condone poisons.

Methods. But whatever, it's worth it to proceed in this negative direction is questionable to the extent that more irreversible destruction means less happy terrorists, and more angry everyday citizens of the world... an all around miserable stew. If you don't know how to stop making poison how are you going to convince anyone you know where it goes? And even if you don't make it yourself, but tell everyone else to make it, isn't that all the more reason to suspect your motives in high security collections of it? Until there is a strong message for the earth, maintained with integrity and sacrifice in every way, until a real care is established, I cannot support an establishment, a process, or a people, or a person, saying something and doing another. *John Adams*

Time 16, 1995

267-1

*Response to Comment No. 267-1*  
 The commentor's opposition to the proposed policy is noted.

**COMMENTOR No. 269: TETERS, DARLENE****RESPONSE TO COMMENT  
COMMENTOR No. 269: TETERS, DARLENE*****Response to Comment No. 269-1***

June 15, 1995  
 TO: DEPARTMENT OF ENERGY - the Office of Spent Fuel Management (Fax# 202-586-4073)  
 C/O MR. CHARLES R. HEAD

First, of all I don't feel it is up to our Nation to house HIGH-LEVEL RADIOACTIVE NUCLEAR WASTE FROM 41 NATIONS. Waste from countries like Japan, Australia, Canada, Sweden & Switzerland etc. In my opinion these countries are not exactly part of the third world. These nations should be held accountable for their own spent fuel and should plan for the safe storage of this highly toxic waste within their own borders.

Second, I don't want this high-level nuclear waste from 41 nations throughout the world which will be routed through Portlan, Oregon or Puget Sound destined for the PACIFIC area at or own HANFORD, WASHINGTON on the Columbia River. Hanford is not an acceptable site for average or even more high-level waste. In fact, Hanford River is the already has a leaking storage pool alongside the columbian River. This river is the lifeflood of our nation and must not be ruined by nuclear contamination. Right now our government has not found a sure and safe way to store radioactive waste. We must remember that the dangers from this waste will not go away for hundreds or even thousands of years. The first several years of the operation is expected to cost UNITED STATES CITIZENS about 1 Billion, like all bids the cost will be more as usual. Our longshoremen have refused to handle these extremely toxic materials because they would be exposed to up to 200 Millions of radioactivity per hour. Even children stuck in traffic jam could be exposed to a significant dose.

Third, I don't trust our general or foreign shipping line to handle this HIGH-LEVEL RADIOACTIVE WASTE on our rivers & highways. In our own country we have had oil spills that has caused alot of damage. The ships are differential, not designed to handle this deadly cargo, accidents do happen under the best of plans. Our President don't want the high-level radioactive waste to get in the wrong hands, so bonds can't be made. In the best of foreign countries corruption can happen. MONEY DOES TALK, this radioactive waste can be sold and the rest ship to the United States. As you can tell I don't support this proposed importation of high-level nuclear waste from the 41 nations to the UNITED STATES.

Sincerely,  
*Darlene Teters*

Darlene Teters  
 2645 Icicle River Road  
 Woodland, Washington 98674

***Response to Comment No. 269-1***

The United States has assumed in the past, and continues to assume, a leadership role in the world community in matters of nuclear weapons nonproliferation. In this role, it initiated programs such as the Reduced Enrichment for Research and Test Reactors (RERTR) program and encouraged other nations to support it. Some of the nations which have supported it such as Britain, France, Japan, Sweden and others may not currently present the same nuclear weapons proliferation risk as other nations. The reasons for considering these nations under this policy are included in Section 1.3 of the EIS.

***Response to Comment No. 269-2***

The commentor's objection to bringing foreign research reactor spent nuclear fuel through the Ports of Portland and Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel through either port, or to any of the ports analyzed in the EIS, is low.

***Response to Comment No. 269-3***

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

***Response to Comment No. 269-4***

Costs for the complete program (40 years) could approach or exceed \$1 billion. Costs to the United States taxpayers would likely be in the low to middle hundreds of millions, depending on which countries participate, how the spent nuclear fuel is handled, when the fees are collected, and other factors. Costs could go much higher, depending on risks relating to geologic disposal. The reason for even considering these expenses is the importance of removing weapons-grade nuclear material from civilian commerce and supporting a conversion of all the world's research reactors to non-weapons-grade material.

SECTION 2.7: INDIVIDUALS

**SE TO COMMENT**

**TETERS, DARLENE (CONT'D.)**

ion dose rate of 200 mrem per hour however, this of the transportation cask, which would be inside of dose rate limit of interest to those that would be men, is 10 mrem per hour at a distance of 2 meters the dose rate limits come from regulation 49 CFR longshoremen would get handling a cask is quite old not be present at the surface of the container for quite short. Appendix D, Section D.4.3.2.1 of the of cask handling, Section D.4.5 of the EIS presents index F, Section F.5 of the EIS presents an evaluation in cask containing foreign research reactor spent exposure for port workers would be 100 mrem per bushed by the NRC to protect individual members IS). As the analysis in the EIS indicates, both the s are low.

; in the EIS are conservative. That is, the actual those presented in Section 4.2.1 of the EIS.

uclear fuel is accepted into the United States, th the foreign research reactor operators. However, shipping firms, United States or foreign flag, be evaluated the use of four types of ships, including rting foreign research reactor spent nuclear fuel fference in the incident-free or accident risk was s (Sections 4.2.1 and 4.2.2), so DOE sees no need ht be used to transport the foreign research reactor

ceptance of foreign research reactor spent nuclear ion 1.3 of the EIS is noted. Sections 2.3, 2.5, and es under consideration.

**O. 271: GUMM , JULIA****RESPONSE TO COMMENT  
COMMENTOR No. 271: GUMM, JULIA**

COMMENT. EN. 37

EI "WHAT WE HAVE BEEN READING IN  
US SOMEONE HAS GOTTEM THE WRONG  
HAS PROPOSED TO IMPORT HIGH-LEVEL  
WASTES THROUGHOUT THE WORLD".  
IN CLEAN UP HAS COST BILLIONS  
FOR BE FINISHED? NOT TO MENTION  
IGNING TOXIC WASTE. ALSO,  
FOR THOUSANDS OF YEARS,  
TO THE FUTURE GENERATIONS...  
SOCIALLY AND PHYSICALLY..."

**Response to Comment No. 271-I**

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

**271-I**

**SECTION 2.7: INDIVIDUALS**

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**RESPONSE TO COMMENT  
#85: AGAINST NUCLEAR WASTE PETITION**

No. 285-I

In response to all actions that would involve bringing foreign research reactor or near the Port of Tacoma is noted. However, analysis of the EIS indicates that the risk associated with bringing spent fuel to the Port of Tacoma, or any other port analyzed in the EIS, is low.

5 of the EIS, the selection of the site or sites at which the spent nuclear fuel would be managed is based on the analysis in Programmatic Spent Nuclear Fuel Management and Idaho Laboratory Environmental Restoration and Waste Management Impact Statement. The Record of Decision for this EIS was in accordance with this Record of Decision, all of the aluminum-clad spent nuclear fuel managed by DOE will be managed at South Carolina. Any other foreign research reactor spent fuel by DOE will be managed at the Idaho National Engineering and Environmental Laboratory. No foreign research reactor spent nuclear fuel would be shipped to foreign research reactor sites.

COMMENTOR No. 285: AGAINST NUCLEAR  
WASTE PETITION (CONT'D.)

RESPONSE TO COMMENT  
COMMENTOR No. 285: AGAINST NUCLEAR  
WASTE PETITION (CONT'D.)

32. Betty Brunner 7004-3rd St. Ct. W. Tac. 98466 #103
23. Bassett E. Holmes Tacoma, WA 98403 (206)572-11
24. Robert G. Cleaves 3716 W. 39th St. Tacoma 98407 206)572-4
25. Robert E. Trustor 1320 Boundary Pkwy. Tacoma 98406
26. James Ahern 2121 S. Alaska St. Tacoma 9840
27. Dick Narans 6402 Gregory St. W. Tacoma. 98466
28. Kurt Con 35355 35th NE Tacoma 9841
- Craig Phillips 905 PIERCE LN NE TACOMA 98422
- Jacqui Keough 1636 N. Seattle " 98422
- June Fahlens 1620 S. Michal St. 3329 Tacoma 98466
19. Henry Jones Port of Seattle P.O. Box 1209 Se. 98114 N Alvar St. Tacoma 98407
30. Koenig Q
31. Andrew E. Gordina 29902 26th Ave S Federal Way, WA 98003-4.
32. JEFF R EVENS 1436 S. MASON AVE TACOMA WA 9840
33. Wesley Isenhardt 2605 North Warner Tacoma 98460
34. DOUG BREWER 2809 NORTH ALVET JEWELL TACOMA 98407
35. Harold H. Noble 3320 Locust Ave. W. University Pk. Wash. 98466  
36. Vernon J. McNeil " " " " " " " " "
37. Lyle Feyton 6207 5a. Montgomery St. Tacoma WA 98404
38. George Pollard 1305-4th & 205 Seattle WA 98101
39. Claude McManus 405 6th Ave. Tacoma, WA 98402

SECTION 2.7: INDIVIDUALS

**PETITION**

ear fuel through  
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SECTION 2.7: INDIVIDUALS

COMMENTOR No. 286: LOCHBURN JUNIOR  
HIGH PETITION (CONT'D.)

RESPONSE TO COMMENT  
COMMENTOR No. 286: LOCHBURN JUNIOR  
HIGH PETITION (CONT'D.)

- 20 ~~Victor Velasquez~~ 12 yrs.  
21 ~~James Bratton~~ 12 yrs.  
22 ~~Will Schaefer~~ 14 yrs.  
23 ~~Robert A. O'Brien~~ 15 yrs.  
24 ~~Peter C. O'Brien~~ 14 yrs.  
25 ~~Richard T. O'Brien~~ 14 yrs.  
26 ~~Janice O'Neill~~ 15 yrs.  
27 ~~John O'Neill~~ 14 yrs. net it was  
28 ~~Alma Molinard~~ 14 yrs.  
29 ~~Robert Forni~~ 14 yrs.  
30 ~~John Hinch~~ 14 yrs.  
31 ~~John Hinch~~ 14 yrs.  
32 ~~John Hinch~~ 14 yrs.  
33 ~~John Hinch~~ 14 yrs.  
34 ~~M. K. Becker~~ 14 yrs.  
35 ~~B. D. Lee Taylor~~ 14 yrs.  
36 ~~C. E. Lee Taylor~~ 14 yrs.  
37 ~~Christie Becke~~ 14 yrs.  
38 ~~Nicole Hinchey~~ 14 yrs.  
39 ~~Angela Forni~~ 14 yrs.  
40 ~~Sandrine Hill~~ 14 yrs.  
41 ~~Christa Christensen~~ 14 yrs.  
42 ~~Jennifer Neith~~ 13 yrs.  
43 ~~Chris Neith~~ 13 yrs.  
44 ~~Heather Ennebacher~~ 15 yrs.  
45 ~~Debbie Glusker~~ 15 yrs.  
46 ~~Maura Shanahan~~ 15 yrs.

NSE TO COMMENT  
3: WHITACRE, KATHRYN & JIM

ing foreign research reactor spent nuclear fuel through did evaluate and consider the environmental impacts the population of the area around the port and along health and safety impacts (Section 4.2), and earthquakes volume or size of the local marine traffic (present or calculation of risk associated with the shipment of fuel. In general, the number of ship mishaps is not traffic because port ship traffic is slow, and even when ships per hour. Historically, increasing the volume probability of an accident. Rather, the number of mishaps roads and distances from the port to the open ocean or Appendix D, Section D.1.9.2 of the EIS). Appendix I is a discussion of the determination of the probability

## SECTION 2.7: INDIVIDUALS

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**RICHARD P. (Cont'd.)**

**RESPONSE TO COMMENT**  
**COMMENTOR No. 289: RYAN, RICHARD P. (Cont'd.)**

al Impact Statement  
 Illustration Policy  
 and Nuclear Fuel

free to use this page and drop it  
 you may mail your comments to  
 us, please provide us with your  
 information or any questions  
 allow us to properly indicate the  
 stat. Thank you.

one: (202) 929-3225  
Answered

Re CAA 21p - 09/02/2002-3/1/23

NOT AN ISSUE

Entire Summary

NECESSARY DUE

NOT APPROPRIATE TO  
ENTIRETY THE COMMENTS  
ON THE ENTIRE CAR  
LINE OR HAD TO  
PUT THEM ON

**Response to Comment No. 289-2**

As discussed in Section 2.7 and Appendix H of the EIS, DOE considers security to be a serious issue all along the transport route.

The requirements for physical protection of spent nuclear fuel shipments are specified in 10 CFR Part 73.37. The principal points are (1) cooperation with local law enforcement agencies, (2) armed escorts, and (3) communications with a communications center that is staffed 24 hours per day. (Section 5.4.2 of the EIS.) For truck shipments in heavily populated areas, one escort vehicle containing an armed guard would lead the truck and another escort vehicle containing another armed guard would follow the truck. In less populated areas, there would be only one escort vehicle instead of two. For rail shipments, the escort would ride on the train in a location that permits observation of the shipment car while the train is in motion.

289-2

## SECTION 2.7: INDIVIDUALS

? (Cont'd.)

the requirements of Appendix D, Section of the considerations nuclear fuel. Other port facilities, access to to the management of entry. Appendix processes. In evaluating well as in the Port of f the EIS presents a

**COMMENTOR No. 289: RYAN, RICHARD P. (CONT'D.)****RESPONSE TO COMMENT****COMMENTOR No. 289: RYAN, RICHARD P. (CONT'D.)****Comments on the Draft Environmental Impact Statement  
of a Proposed Nuclear Weapons Nonproliferation Policy  
Concerning Foreign Research Reactor Spent Nuclear Fuel**

In give us written comments, please feel free to use this page and drop it ion table when you leave. Alternatively, you may mail your comments to f Energy at the address listed below. Also, please provide us with your telephone number for any follow-up information or any questions ent of your comments. This will also allow us to properly indicate the ments in the comment response document. Thank you.

RICHARD P. RYAN      Phone: (202) 927-3703  
 Address: NO THANG HOME OWNER  
1555 PINE ST NE  
WA      State WA      Zip 200027-3703

**\*\*\* COMMENTS \*\*\***

THE FUEL IS MOVED THE MORE LIKELY  
OF AN ACCIDENT OCCUR IN THE MEAN  
WHEN AT ITS FOREIGN SITES.

289-4

**Response to Comment No. 289-4**

The commentor's preference for storing spent nuclear fuel at foreign research reactor sites is noted (Management Alternative 2, Section 2.3 of the EIS). Risks to human health and the environment which could result from transportation of spent nuclear fuel from foreign research reactors were evaluated and found to be low (Section 4 of the EIS).

**Address Correspondence to:**

Head  
 Fuel Management, EM-37  
 Dept. of Energy  
 1000 Independence Avenue, SW  
 DC 20585-0001

**COMMENTOR No. 289: RYAN, RICHARD P. (CONT'D.)****RESPONSE TO COMMENT  
COMMENTOR No. 289: RYAN, RICHARD P. (CONT'D.)****Written Comments on the Draft Environmental Impact Statement  
on a Proposed Nuclear Weapons Nonproliferation Policy  
Concerning Foreign Research Reactor Spent Nuclear Fuel**

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Richard P. Ryan Phone: (202) 927-3203  
 Title and Organization: NE TAKING HOME CLOTHES  
 Address: 3535 55th Ave NE  
 City: TACOMA State WA Zip 98422-3223

**\*\*\* COMMENTS \*\*\***

EXPOSEE TO 1000 DEGREES OF 1475° F FOR 30 MINUTES  
IS NOT EXCERABLE, SHIP BOARD THERMISTORS EXCEED 1475°  
AND WILL LAST MUCH LONGER THAN 30 MINUTES,

DO NOT SHIP HEU TO US STORAGE SITES,  
MATERIAL ON LOCATOR, THE MORE HEU IS MADE  
TO REPROCESS THE MORE LIKELY IT WILL BE  
BE COM PROMISED.

**Response to Comment No. 289-5**

The transportation casks that would be used for the foreign research reactor spent nuclear fuel are certified if their design meets certain tests, including a fire test, and if the individual casks pass periodic inspections (Section 2.6.2 of the EIS). These certification standards were developed for use of the transportation casks on land, hence the 30 minute fire test, which is considered to be the extent of a high intensity fire resulting from a collision with a tanker truck. The duration of a ship fire is directly related to the amount of combustibles carried on board. In spite of this potential, the number of severe fires on ships is relatively small. Data available on the last 15 years from Lloyd's of London indicates that of 1,073 ship collisions in port worldwide, only eleven led to fires, and of those, only five caused extensive damage, with only one actually causing buckling of structures.

In respect to the impact a ship fire might have on a spent nuclear fuel transportation cask, there are three facts that would mitigate the potential damage. First, ship fires tend to move to different areas of the ship as the combustible material is consumed, so the cask would not be exposed for the entire duration of the fire. Second, a ship fire's intensity is normally limited by the amount of oxygen that can reach the interior of a hold. Third, all ships that would be used to transport foreign research reactor spent nuclear fuel have built-in fire suppression equipment, which at a minimum would keep fires well below the extreme temperatures needed to damage the transportation cask. For these reasons, it would be almost impossible for spent nuclear fuel inside the transportation cask to reach 900 degrees Kelvin (1,160 degrees F), the melting point of research reactor spent nuclear fuel. The probability of reaching such a temperature was calculated to be less than one in a billion (Attachment D5 to Appendix D of the EIS). To put this temperature into perspective, steel used in a ship's structure buckles at around 700 degrees Kelvin (300 degrees F).

The EIS contains the results of an analysis of the effects of an accident that involves a severe fire (severity category 6), which does not reach the temperature to melt research reactor nuclear fuel. Appendix D, Sections D.5.3 and D.5.4 present a detailed discussion of accident probabilities and radioactive material source terms and the results of the analyses, respectively.

In conclusion, although long duration ship fires are possible, and have occurred, they are uncommon events. Analyses in the EIS indicate that even in the event of a severe ship fire involving a transportation cask, neither the consequences nor risks are great (Appendix D, Section D.5.5 of the EIS).

**To Mail in Comments, Address Correspondence to:**

Mr. Charles R. Head  
 Office of Spent Fuel Management, EM-37  
 U.S. Department of Energy  
 1000 Independence Avenue, SW  
 Washington, DC 20585-0001

**ONSE TO COMMENT**  
**89: RYAN, RICHARD P. (CONT'D.)**

**89-6**

foreign research reactor spent nuclear fuel should remain  
rated is noted. Overseas management is Management  
Sections 2.3 and 4.4 of the EIS.

**89-7**

actor spent nuclear fuel through the same port by which  
[actual], partially because some of the enriched uranium  
ption not available for the foreign research reactor spent  
in Sections 4.2.2 and 4.5 of the EIS indicates that the  
nt nuclear fuel to the Port of Tacoma, or to any of the

**COMMENTOR No. 289: RYAN, RICHARD P. (Cont'd.)**

**RESPONSE TO COMMENT**  
**COMMENTOR No. 289: RYAN, RICHARD P. (Cont'd.)**

**Written Comments on the Draft Environmental Impact Statement  
 on a Proposed Nuclear Weapons Nonproliferation Policy  
 Concerning Foreign Research Reactor Spent Nuclear Fuel**

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Richard P. Ryan Phone: (202) 502-3703  
 Title and Organization: NE TRACMA Homeowner  
 Address: 3555 SCOTT ST NE  
 City: TRACMA State: WA Zip: 98022-3223

\*\*\* COMMENTS \*\*\*

IE HED IS TO BE TRANSFERRED TO TRACMA THERE  
SHOULD BE A PROVISION MADE TO INSPECT THE  
CARGO PRIOR TO ENTERING THE PORT-SEAHD  
TO ENSURE CONTAINERS TO-TRANSPORTERS REQUIREMENTS  
HAVE NOT BEEN COMPROMISED.

289-8

To Mail in Comments, Address Correspondence to:  
 Mr. Charles R. Head  
 Office of Spent Fuel Management, EM-37  
 U.S. Department of Energy  
 1000 Independence Avenue, SW  
 Washington, DC 20585-0001

**No. 290: RYAN, LAURA****RESPONSE TO COMMENT  
COMMENTOR No. 290: RYAN, LAURA**

Environmental Impact Statement  
 Spent Nonproliferation Policy  
 Research Reactor Spent Nuclear Fuel

Please feel free to use this page and drop it in the mail. Alternatively, you may mail your comments to us. Also, please provide us with your name, address, telephone number, and e-mail address if you have one. This will also allow us to properly indicate the response document. Thank you.

Phone: (202) 227-3203  
 NE  
 State VA Zip 20522-3123

MENTS ...

CERTAIN PROVISIONS  
NUMBER OF HEL CONTAINERS (MAX.)  
 2  
ON FOR HOLD CLOSE  
BE SHIPPED IN DORMANT  
LINKS

**Response to Comment No. 290-1**

As described in detail in Sections 5.3 and 5.4 of the EIS, in addition to a series of applicable domestic regulations, international transportation of hazardous material is governed by the International Movement of Dangerous Goods (IMDG) Code, which is associated with the International Maritime Organization. This code essentially establishes the international rules for shipping hazardous cargos, which includes foreign research reactor spent nuclear fuel. Included are regulations that deal with carriage of radioactive material (Class 7 materials). They are based on the International Atomic Energy Agency regulations and deal with segregation of radioactive materials packages from other dangerous goods and other aspects of stowage, including the quantity of radioactive material to be shipped. To ensure that the IMDG Code and all other safety requirements, such as the Safety of Life at Sea (SOLAS), are followed, DOE would contractually require that only reputable shipping firms be used to ship the foreign research reactor spent nuclear fuel covered by this proposed action.

**290-1**

## SECTION 2.7: INDIVIDUALS

MARGARETE

- spent nuclear fuel through  
analysis in Sections 4.2.2  
- bringing spent nuclear fuel  
of the ports analyzed in the

**COMMENTOR No. 292: SUSARZ, DONNA****RESPONSE TO COMMENT  
COMMENTOR No. 292: SUSARZ, DONNA**

**Written Comments on the Draft Environmental Impact Statement  
on a Proposed Nuclear Weapons Nonproliferation Policy  
Concerning Foreign Research Reactor Spent Nuclear Fuel**

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Donna Susarz Phone: 475-6977  
 Title and Organization: \_\_\_\_\_  
 Address: 3827 So. G. St  
 City: Tucson State: AZ Zip: 85408

**... COMMENTS ...**

Let's tell the world we don't want  
nuclear power, we don't want  
nuclear wastes.

**292-I****Response to Comment No. 292-I**

The commentor's opposition to nuclear power or nuclear waste is noted.

To Mail in Comments, Address Correspondence to:

Mr. Charles R. Head  
 Office of Spent Fuel Management, EM-37  
 U.S. Department of Energy  
 1000 Independence Avenue, SW  
 Washington, DC 20585-0001

**COMMENTOR No. 293: Otis, GLENN**

**RESPONSE TO COMMENT**  
**COMMENTOR No. 293: Otis, GLENN**

**Written Comments on the Draft Environmental Impact Statement  
on a Proposed Nuclear Weapons Nonproliferation Policy  
Concerning Foreign Research Reactor Spent Nuclear Fuel**

If you would like to give us written comments, please feel free to use this page and drop it off at the registration table when you leave. Alternatively, you may mail your comments to the Department of Energy at the address listed below. Also, please provide us with your name, address, and telephone number for any follow-up information or any questions concerning the intent of your comments. This will also allow us to properly indicate the source of the comments in the comment response document. Thank you.

Name: Glenn Otis Phone: 509-255-0505  
Title and Organization: \_\_\_\_\_  
Address: 3131 Rainier St W  
City: Tacoma State WA Zip 98466

... COMMENTS ...

(Handwritten signature and initials over the lines)

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**Response to Comment No. 293-1**

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

**293-1**

**To Mail In Comments, Address Correspondence to:**

Mr. Charles R. Head  
Office of Spent Fuel Management, EM-37  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-0001

**DNSE TO COMMENT  
DO. 294: FORM LETTER D**

**4.1**

use of the Port of Tacoma for receipt of foreign research  
Populations surrounding candidate ports and along  
ent sites were a factor in the selection of candidate  
of the EIS). The analysis in Sections 4.2.2 and 4.5 of  
ciated with bringing spent nuclear fuel to the Port of  
yzed in the EIS, is low.

**4.2**

provide an evaluation of consequences and risks of  
ils are given Appendix D. If a policy to accept foreign  
is adopted, fuel elements would be shipped in casks  
y collision and fire (Section 2.6.2 of the EIS). In the  
breached by collision and/or fire, the radiologica  
ated to be low and the associated risks would also be

**SECTION 2.7: INDIVIDUALS**

**COMMENTATOR No. 294: FORM LETTER D (Cont'd.)**

**RESPONSE TO COMMENT  
COMMENTATOR No. 294: FORM LETTER D (Cont'd.)**

is form letter:

Jennings, Sally

Jonker, Janie

Pennington, Valerie

Salter, Annie

YY

This alternative is

In Section 2.2 of

This reactor spent  
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ability of a cask

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nal applications.

year fuel through  
4.5 of the EIS  
Port of Tacoma,  
Office of Marine

**03: Withrow, Wayne**

**RESPONSE TO COMMENT  
COMMENTOR No. 303: Withrow, Wayne**

**DU CAN STOP  
ASTE FROM  
HERE  
ONE HAND.**

Waste Through Tacoma.

Address	120 MacClellan A. Building
City/State	Tacoma, Washington
Zip Code	98466
Telephone	(206) 975-2212
Comments	Environmental Management, Office of Science, Washington, DC 20585
Date	10/10/95

**Response to Comment No. 303-1**

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

**303-1**

waste is right at your fingertips.  
Can you feel about their possible plan to ship 19.2 tons  
in the next 13 years? So, pick up a pen, fill out this form and  
let them know that Tacoma is not a place for nuclear waste.  
[ ] Tacoma Hot Line at 597-7575.  
Chairwoman of Healthy People Citizens' Info. Mktg. Bureau, Future Hwy.  
Chairwoman, Pierce County Centralia Council and Pierce County  
Chamber of Commerce; Pierce County Centralia Council and Pierce County

**COMMENTOR No. 303: WITHROW, WAYNE (Cont'd.)****RESPONSE TO COMMENT  
COMMENTOR No. 303: WITHROW, WAYNE (Cont'd.)**

95

Dear Citizen,

for inquiring about the nuclear fuel shipments that could move through the Port of Tacoma. The Port of Tacoma is one of 10 possible ports of entry listed in the Environmental Impact Statement.

The Port of Tacoma fact sheet on the nuclear fuel shipments, a form for your list of risk issues that the Department of Energy has overlooked.

To voice your opinion and have an impact upon the nuclear fuel shipments is the only record will be written responses. The public comment period closes 5/5. The Port of Tacoma urges you to write the DOE at the following address:

Charles Head, Program Manager  
Office of Spent Nuclear Fuel Management (EM-37)  
U.S. Department of Energy  
1000 Independence Avenue SW  
Washington DC, 20585  
Phone Number (202) 586-9441  
Fax Number (202) 586-5256

Box 1837 • Tacoma, Washington 98401-1837 • Telephone: (206) 383-5841  
Stephen R. Anderson • Jack A. Fabulich • Mike Fletcher • Patrick O'Malley • Jerry M. Thorpe  
Executive Director: John J. Terpstra

**RESPONSE TO COMMENT**  
**COMMENTOR No. 303: WITHROW, WAYNE (CONT'D.)**

**Response to Comment No. 303-2**

Updated information on the Port of Tacoma has been incorporated into Appendix D, Section D.2.1.9 of the EIS. A review of the map of Seattle and transport routes found no outdated or inaccurate information. The data on populations that are presented, and used in the analyses, are from the 1990 census.

**Response to Comment No. 303-3**

In the unlikely event that a transportation cask loaded with foreign research reactor spent nuclear fuel were to sink in U.S. coastal waters, it would be recovered, even from the deepest portions of Puget Sound, which reaches depths of 305 meters (1000 feet). Appendix C, Section C.5.5 of the EIS provides information on the probability of a cask sinking in coastal and deep ocean waters. Section 4.2.1.3 of the EIS has been rewritten to more clearly state DOE's intentions in cask recovery.

**Response to Comment No. 303-4**

Shipment of foreign research reactor spent nuclear fuel would not jeopardize the significant cleanup effort undertaken in the area of Commencement Bay and the Port of Tacoma as noted by the commentor. Nor should it contribute to any "dirty port" stigma because the analysis in the EIS indicates that there would be no significant adverse impacts to any of the ports or bays, or the quality of water or air (Section 4.2.1.1 and Appendix C, Section C.2 of the EIS). Spent nuclear fuel transportation casks are designed and built to preclude release of radioactive material. Based on over 30 years of experience in shipping spent nuclear fuel, DOE considers that spent nuclear fuel transportation casks passing through the Port of Tacoma, Commencement Bay, or any other port or waterway would not release their radioactive contents, and thus would not affect air or water quality. A paragraph has been added to Section 4.2.2.2 of the EIS to make this point and emphasize the no-impact nature of these shipments on air and water quality.

**Response to Comment No. 303-5**

Appendix D, Section D.5.3.1 of the EIS describes several accident scenarios that involve fire. The results of the analysis of these accidents can be found in Section D.5.4. The analysis shows that even in the event of a severe ship fire, neither the consequences nor risks are great (Appendix D, Section D.5.5). Although such a catastrophic accident would obviously impact the local environment and also the local businesses, no impacts are predicted due to the presence of foreign research reactor spent nuclear fuel. In fact, the analysis of impacts associated with an accident involving foreign research reactor spent nuclear fuel also determined that no decontamination, interdiction, or condemnation of property would result from the worst plausible accident (Section 4.2.2.3 and Appendix D, Section D.5 of the EIS).

In addition to evaluating the worst case plausible fire, the EIS also evaluated the impacts of a ship fire so severe that it is considered not plausible. These results are discussed in Appendix D, Section D.5.4.3.2 and Attachment D to Appendix D.

'D.)

**COMMENTOR No. 303: WITHROW, WAYNE (CONT'D.)****RESPONSE TO COMMENT****COMMENTOR No. 303: WITHROW, WAYNE (CONT'D.)**

The effects of a severe explosion on a foreign research reactor spent nuclear fuel transportation cask were not evaluated because the radiological impacts of the fire discussed above would be worse, or "bound" the results of an explosion. With a severe fire not only is the cask violated, as it might be by a large explosion, but the heat of the fire would lift what is released from the cask, spreading the radioactive material farther, affecting more people.

**303-7  
(Cont'd)**

*Note: No provision were made in the DEIS for upgrading and training of local first response teams. In addition long-term effects on loss of business, infrastructure and long-term-effect on the acquisition of future business was completely ignored by DOE.*

**DOE DID NOT ADEQUATELY CONCERN LIFE CYCLE COSTS, BENEFITS AND GENERAL RISK AS WELL AS FULLY IGNORING FAIRNESS/EQUITY ISSUES IN SELECTING SMALLER PORTS – DOE did not analyze the effects of an accident classified as a disaster on the local area infrastructure and population. DOE did not address effects and costs incurred in the local area should an accident occur.**

*Note: These two pages constitute pages 17-25 on the page of contents.*

**Response to Comment No. 303-6**  
Appendix H, which was added to the final EIS in response to public comments, contains the general provisions for emergency preparedness and security measures associated with the transportation of foreign research reactor spent nuclear fuel in the United States. The provisions include an interface between DOE and State, Tribal, and local authorities, prior to the implementation of the policy, for the identification and resolution of emergency management and security issues specific to the communities that would be affected. These issues include capabilities and training of first emergency responders. Funding for special needs, if necessary, would be addressed during this interface.

**Response to Comment No. 303-7**

Under NEPA, the socioeconomic effects evaluated for this EIS do not include those associated with psychological fear of receiving spent nuclear fuel at the Port of Tacoma. Foreign research reactor spent nuclear fuel shipments are subject to the same types of potential hazards as those of other ships carrying nonradiological hazardous materials.

Each port considered in the EIS has developed an Area Contingency Plan. This plan outlines response capabilities, procedures and authorities for responding to and recovering from hazardous material incidents. Additionally, DOE would provide assistance to local authorities to ensure that appropriate measures would be taken in the unlikely event of an accident. As part of this assistance, DOE's Radiological Assistance Program teams, from eight offices strategically located throughout the country, would be used to coordinate and to provide remediation assistance. This type of assistance and coordination would be specified in the Transportation Plan to be prepared prior to any individual spent nuclear fuel shipment and coordinated with State and local officials. The general provisions of the Transportation Plan are included in Appendix H of the EIS. The provisions include an interface between DOE and State, Tribal, and local authorities.

**Response to Comment No. 303-8**

Several accident scenarios including a breach of the cask and fire sufficient to oxidize the contents were analyzed during preparation of the EIS. Results of the accident analysis at the ports are given in Section 4.2.2 of the EIS with supporting detail in Appendix D, Section D.5. No catastrophic effects were found to result from severe accidents involving foreign research reactor spent nuclear fuel.

**SECTION 2.7: INDIVIDUALS**

**E TO COMMENT  
06: PORTER, CHRISTINE**

foreign research reactor spent nuclear fuel through State of Washington is noted. However, analysis indicates that the risk associated with bringing spent [any of the ports analyzed in the EIS, is low.

[the selection of the site or sites at which the fuel would be managed is based on the analysis in Spent Nuclear Fuel Management and Idaho Environmental Restoration and Waste Management Record of Decision for this EIS was made with this Record of Decision, all of the aluminum-clad fuel managed by DOE will be managed at Altona. Any other foreign research reactor spent fuel will be managed at the Idaho National Engineering Research reactor spent nuclear fuel would be shipped

**COMMENTOR No. 308: Squyres, Deanna****RESPONSE TO COMMENT  
COMMENTOR No. 308: Squyres, Deanna**

June 19, 1995

U.S. Department of Energy  
Washington DC

Attn: Committee for locating port to dispose of nuclear waste

I am opposed to your proposal to bring weapons grade nuclear waste through the Port of Tacoma. I am unable to attend the community hearing and would like it noted that my voice is in this written form.

I am also concerned about the lack of publicity regarding and advertising of the second public meeting, as well as the decision to not include comments made by concerned citizens as part of the public record.

I recognize the difficulty in effectively transporting nuclear waste for disposal. I also recognize the need for sound judgment in the decision making for that process. Sound judgement should not ignore the fact that accidents do happen; and should an accident occur in or near the Port of Tacoma the lives of thousands could be impacted not to mention the environmental impact. I strongly believe that this needs to occur in an area less densely populated, and where there would be minimal environmental impact should an accident occur.

My family and I have lived in Tacoma all of our lives and travel through the port area on a regular basis. This unsafe use of the port not only puts the personal safety of me and my family at risk, but the lives of thousands of others.

*Our Port does not support your proposal. Our elected city officials do not support your proposal. The Port's union does not support your proposal. Other concerned groups do not support your proposal. My family and I do not support your proposal.*

Sincerely,

*Deanna Squyres*  
Deanna Squyres  
4532 South 32nd Street  
Tacoma, Wa. 98409

**Response to Comment No. 308-1**

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

**Response to Comment No. 308-2**

DOE placed advertisements for the June 19, 1995 hearing in the Tacoma Tribune on June 12 and 18, 1995. In addition, interest groups placed advertisements in the same paper. As for the commentor's concern that DOE would not include comments made "by concerned citizens as part of the public record," this is untrue. While DOE did request that comments be submitted in writing, all oral comments presented at each hearing were summarized and have been addressed in this Volume 3 of the final EIS. All comments, written and oral, are part of the public record.

**Response to Comment No. 308-3**

The analysis in Sections 4.2.2 and 4.5 of the EIS indicate that the risk associated with bringing foreign research reactor spent nuclear fuel through the Port of Tacoma, or any other port analyzed in the EIS, is low. The use of a remote port might slightly reduce the already low consequences of an accident, however there are other considerations that also must be made when making port selection. Appendix D, Section D.1.9 of the EIS presents a complete discussion of the port selection process.

**308-1  
(Cont'd.)**

Sincerely,

*Deanna Squyres*  
Deanna Squyres  
4532 South 32nd Street  
Tacoma, Wa. 98409

**ONSE TO COMMENT  
No. 309: AMDAHL, ONETA**

**09-1**

ing foreign research reactor spent nuclear fuel through  
ever, analysis in Sections 4.2.2 and 4.5 of the EIS  
with bringing spent nuclear fuel to the Port of Tacoma,  
the EIS, is low.

**09-2**

be submitted in writing, however, all oral comments  
summarized and have been addressed along with the  
3 of the final EIS. All comments, written and oral, are  
vertising for the public hearings, advertisements were  
June 12 and 18, 1995. In addition, the meeting was  
ups who placed their own ads in the Tacoma Tribune.

**09-3**

: discussed in Section 4.2.3 and Appendix E of the EIS.  
to be low.

**09-4**

spills in Puget Sound or elsewhere because the solid  
ide a transportation cask, so there is nothing to spill.  
of a sunken cask, both recovered and unrecovered, are  
he EIS. Should an accident occur in Puget Sound that  
ign research reactor spent nuclear fuel sinking, the cask  
f the depth.

n casks are designed and built to preclude release of  
radiative contents have ever been released from a spent  
is a result of an accident.

**09-5**

s and risk associated with an accident in port involving  
nuclear fuel determined that no decontamination,  
property would result from the worst plausible accident  
, Section D.5 of the EIS) and that the risk associated  
e proposed action, was low (Section 4.2.2.3 of the EIS).  
isks associated with marine transport were found to be

**SECTION 2.7: INDIVIDUALS**

**COMMENTOR No. 313: POWERS, MARY SHEILA**

**RESPONSE TO COMMENT  
COMMENTOR No. 313: POWERS, MARY SHEILA**

Toronto 19 June 1977  
Mr. Charles Head  
Chairman

The information re: risks of cancer  
are inaccurate. Please see studies  
of the Monroe, MI IHM Sisters on  
the incidence of cancer in the downtown  
area it area after the Fermi incident until  
today. The physicians for social  
responsibility are need to be considered.  
Outside physicians (not just physicians)  
need to be included as experts - e.g.  
Canadian.

Mary Sheila Powers  
Toronto, ON  
② response to talk

6/28/77

**313-I**

**Response to Comment No. 313-I**

The methods used in this EIS to estimate risks of cancer due to radiation exposure are endorsed and accepted by the U.S. Nuclear Regulatory Commission and the International Commission on Radiological Protection. These bodies developed these standards in consultation with physicians.

**RESPONSE TO COMMENT  
COMMENTOR No. 314: BERG, ARILL & JANE**

**G JANE**

6/19/95

**Response to Comment No. 314-1**

The commentor's opposition to bringing foreign research reactor spent nuclear fuel through the Port of Tacoma is noted. However, analysis in Sections 4.2.2 and 4.5 of the EIS indicates that the risk associated with bringing foreign research reactor spent nuclear fuel to the Port of Tacoma, or to any of the ports analyzed in the EIS, is low.

As discussed in Section 4 of the EIS, foreign and domestic spent nuclear fuel has been transported in the United States for over 40 years by DOE without a single radiological incident. As discussed in Section 4 and Appendix F, this spent nuclear fuel could be safely stored at one or more of the candidate management sites pending ultimate disposition.

The risk of releasing radioactive material from a foreign research reactor spent nuclear fuel transportation cask as the result of a seismic event is low. Spent nuclear fuel transportation casks are designed and built to withstand significant punishment without releasing their contents (Section 2.6.2 of the EIS). Therefore, an avalanche or a seismic event, even if it caused structures at the Port of Tacoma to fail, is not expected to compromise the spent nuclear fuel transportation cask. Further, the analyses of impacts associated with accidents involving foreign research reactor spent nuclear fuel presented in Section 4.2.2.3 of the EIS demonstrate that the use of any of the selected ports would not pose any significant risk to the port personnel or the population near the ports. The Port of Tacoma has considerable relevant experience in handling containers, and has the capability to safely handle containerized foreign research reactor spent nuclear fuel (Appendix D, Section D.1.9.1 of the EIS).

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford site.

DOE considers that the use of any of the ports indicated by the port selection process, including Tacoma, would not impact normal commercial operations, and therefore not endanger the ports' status with respect to their clients. This is based on the fact that the foreign research reactor spent nuclear fuel would be accepted into the United States in standard shipping containers that would require no special handling or precautions. As

**314-1**

**314-2**

SECTION 2.7: INDIVIDUALS

› **COMMENT  
G, ARILL & JANE (CONT'D.)**

or economic reaction to the use of the port.  
al impacts to the ports that received foreign  
plus years it was received.

reign research reactor spent nuclear fuel are  
the EIS. DOE is currently evaluating the  
at Yucca Mountain, NV. In the meantime,  
tion policy requires DOE and the Department  
ith the foreign research reactor spent nuclear  
ctions 2.1 and 4.2.7 of the EIS, if a geologic  
n research reactor spent nuclear fuel or its  
to chemical separation or other processing  
ge the material in existing facilities at the

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***COMMENTOR No. 315: PORTER, JOANNE C. (Cont'd.)***

***RESPONSE TO COMMENT  
COMMENTOR No. 315: PORTER, JOANNE C. (Cont'd.)***

Appendix H has been added to the final EIS in response to public comments, to better describe the security and emergency preparedness associated with transportation of the foreign research reactor spent nuclear fuel. This appendix presents the general provisions of the Transportation Plan, which is a document that provides all of the details associated with the transportation of the foreign research reactor spent nuclear fuel, including the security arrangements in port and in transit to the management site.

OAN M.

spent nuclear fuel through  
2.2 and 4.5 of the EIS  
factor spent nuclear fuel  
is low.

fuel by rail is presented

the State of Washington  
adverse impacts to the  
and interim management  
geographical locations

mination to the general

group or individual can  
lally reduce the risk. All  
e conducted meeting, or  
regulations (10 CFR part  
fy these requirements, it  
l additional security. To  
ated with transportation  
s been added to the final  
general provisions of the  
details associated with  
l, including the security

**SECTION 2.7: INDIVIDUALS**

**RESPONSE TO COMMENT  
No. 317: HESS, GEORGE H., M.D.**

**No. 317-1**

benefits should be balanced against risks. The risks associated with the use of the naval facility at Bangor, Washington for research reactor spent nuclear fuel is noted. As recommended by the Department Command, a total of eight military ports were evaluated for their experience with dry containerized cargoes. The naval facility at Bangor did not have appropriate experience with transshipping containerized

**No. 317-2**

Sections D.1.8 and D.1.9 of the EIS present a detailed discussion of the use of the naval facility at Bangor, Washington for research reactor spent nuclear fuel is noted. As recommended by the Department Command, a total of eight military ports were evaluated for their experience with dry containerized cargoes. The naval facility at Bangor did not have appropriate experience with transshipping containerized

Sections D.1.8 and D.1.9 of the EIS present a detailed discussion of the use of the naval facility at Bangor, Washington for research reactor spent nuclear fuel is noted. As recommended by the Department Command, a total of eight military ports were evaluated for their experience with dry containerized cargoes. The naval facility at Bangor did not have appropriate experience with transshipping containerized

## SECTION 2.7: INDIVIDUALS

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SECTION 2.7: INDIVIDUALS

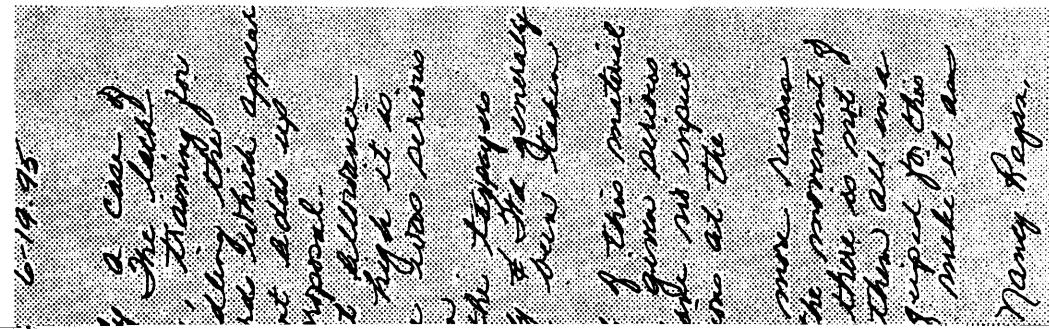
**SE TO COMMENT  
: WRIGHT, CURTIS (CONT'D.)**

[3] with the geological characteristics of the Tacoma

[4] population of the Puget Sound area and surrounding appropriate to use the Port of Tacoma to bring in the [fuel]. Section 4.2.2 of the EIS evaluates the impacts the results of these analyses, which take into account associated with this activity at any of the assessed ports such as Seattle.

**RESPONSE TO COMMENT**  
**COMMENTOR No. 321: VARNER, PAULA**

Varner, Paula



**Response to Comment No. 321-1**

The laws, regulations, and other requirements applicable to transportation and storage of foreign research reactor spent nuclear fuel are described in Section 5 of the EIS. As discussed in Section 2.6.3.2.2 of the EIS, foreign research reactor spent nuclear fuel transportation casks would usually be transported in standard shipping containers. Cranes would be used to unload the containers or transportation casks from the vessel and onto trucks or rail cars. No special training would be required for dock workers. Standard shipping containers are usually unloaded in less than two minutes per container, while unloading non-containerized casks would require several minutes longer. Shipments of spent nuclear fuel are inspected throughout transportation and handling (Sections 2.6.3 and 2.6.5 of the EIS).

**Response to Comment No. 321-2**

Radiation risk factors used in the analysis are endorsed and accepted by the U.S. Nuclear Regulatory Commission and the International Commission on Radiological Protection. Everyone receives some radiation from natural sources. As discussed in Section 4.10.2 of the EIS, measured variations in this background radiation dose are larger than the increase that could occur under the proposed action.

**Response to Comment No. 321-3**

The impact to the health and safety of the public in the vicinity of the ports of entry and the ground transportation routes has been assessed in Section 4.2 of the EIS and found to be low. DOE has not identified a financial burden to the taxpayers of the vicinity that would result from the transportation of foreign research reactor spent nuclear fuel through the Port of Tacoma.

**Response to Comment No. 321-4**

The regulatory requirements applicable to the transportation casks that would be used to transport the foreign research reactor spent nuclear fuel are discussed in Appendix B, Section B.2 of the EIS. These requirements include regulations established by the U.S. Department of Transportation and the NRC. In addition, a DOE representative would be present at the foreign research reactor site prior to the loading of the spent nuclear fuel in the transportation cask. Further, a Transportation Plan detailing inspection procedures for the loading of the spent nuclear fuel at the foreign research reactor site would be provided by DOE prior to policy implementation. General provisions of the Transportation Plan are provided in Appendix H, which was added to the final EIS in response to public comments.

321-5

**SECTION 2.7: INDIVIDUALS**

**COMMENTOR No. 321: VARNER, PAULA (Cont'd.)**

**RESPONSE TO COMMENT  
COMMENTOR No. 321: VARNER, PAULA (Cont'd.)**

***Response to Comment No. 321-5***

As explained in Section 1.5 of the EIS, the selection of the site or sites at which the foreign research reactor spent nuclear fuel would be managed is based on the analysis in the Department of Energy Programmatic Spent Nuclear Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Programs Environmental Impact Statement. The Record of Decision for this EIS was released on May 30, 1995. In accordance with this Record of Decision, all of the aluminum-based foreign research reactor spent nuclear fuel managed by DOE will be managed at the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford Site.

*Just Day No. 1!  
Paula Varner  
3315 N 27th St  
Jamestown ND 78367*

TO COMMENT  
TO: POWERS, M. SHEILA

of each country managing its own spent nuclear  
ent Alternative 2 or the No Action Alternative,  
1.2.5 of the EIS, respectively. The policy  
s of these two alternatives are discussed in

reendorsed and accepted by the U.S. Nuclear  
n Commission on Radiological Protection.  
ural sources. As discussed in Section 4.10.2  
ckground radiation dose are larger than the  
d action.

I shipments are subject to the same types of  
trying nonradiological hazardous materials.  
Open an Area Contingency Plan. This plan  
d authorities for responding to and recovering  
nally, DOE would provide assistance to local  
res would be taken in the unlikely event of an  
Radiological Assistance Program teams, from  
ut the country, would be used to coordinate  
type of assistance and coordination would be  
uld be prepared prior to any individual spent  
tate and local officials. The general provisions  
ppendix H, which was added to the final EIS

SECTION 2.7: INDIVIDUALS

**RESPONSE TO COMMENT  
DR No. 322: POWERS, M. SHEILA (CONT'D.)**

olic comments. The provisions include an interface between DOE and local authorities, prior to the implementation of the policy, for the resolution of emergency management and security issues specific to that would be affected.

**Comment No. 322-4**

request to conduct additional study into nuclear waste containment outside the scope of this EIS.

## SECTION 2.7: INDIVIDUALS

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**COMMENTOR No. 323: KUEBER, MARY E. (CONT'D.)**

(2)

-if you want to. But, clean up your mess in the kitchen, when you are through. Whoever is cooking in the nuclear kitchen should clean up their respective mess.

The State of Washington has historically cooperated, if not, welcomed the U.S. Governmental programs in the Nuclear Defense of Democracy. The fact, previously given, that Hanford, Wash., contains the largest, most complex volume of plutonium in the U.S., with current problems in processing the spent fuel is given as evidence. Billions of dollars have already been spent on research and development, with little fiction, remaining a process on paper. Deteriorating storage sites have been documented at Hanford. This situation should give good reason to pause the importation of unprocessed spent nuclear fuel from overseas locations. It seems, that the United States has made promises to other Nations concerning this matter, before first cleaning up the serious nuclear mess in its own kitchen. The U.S. is not, and should not be viewed by the Global community as a nuclear dump site. The Treaty On Non-Proliferation of Nuclear Weapons should be permanent cornerstone legislation. Responsibility in peaceful uses of nuclear materials must be shared by those who choose to use them. The mess left in the nuclear kitchen must be cleaned up by those who choose to "bake" there. Hopefully, LEU fuel will become the primary source for research reactors and medical use, lessening the danger and costs of reprocessing spent fuel. Decentralization of sites, with vitrification occurring overseas, and burial in the United States would be the optimum route for safety and security.

Thank you for the opportunity to render comment on the Nuclear Waste Handling project, and for U.S. Government participation in this project ensuring the safer world for present and future generations. Thankyou to the Department of Energy, and DOE Secretary O'Leary for investigative work regarding nuclear waste management problems, and for sharing this information with citizens. This memo closes with quotations from DOE Officials in a published article on this subject.

Now that nuclear testing has ended, at least in the U.S., the government is left with a vast, pulsating landscape of atomic waste dumps to clean up. The people who developed nuclear reactors and weapons were no more prescient about future environmental hazards than they were about health risks. The storage of spent fuel and other nuclear materials was shockingly sloppy. "Every time you turn over a new document, there's a \$5 billion problem," says Dan Reicher, a special assistant to O'Leary.

The DOE's nuclear-weapons complex spread over 4,000 square miles in 13 states appears to be particularly hazardous. The secretary bucked her own bureaucracy by insisting that the DOE release a report on deteriorating storage sites for spent nuclear fuel. Aides warned that disclosure could cause liability problems. O'Leary insisted, "I want this done," she said. But there's a lot more to do. "It's as if you had a party for 45 years, and you never cleaned it up," says

**RESPONSE TO COMMENT  
COMMENTOR No. 323: KUEBER, MARY E. (CONT'D.)**

(2) the Savannah River Site in South Carolina. Any other foreign research reactor spent nuclear fuel to be managed by DOE will be managed at the Idaho National Engineering Laboratory. Accordingly, no foreign research reactor spent nuclear fuel would be shipped to the Hanford site.

**Response to Comment No. 323-3**

See last paragraph of response to comment 323-2, above.

**Response to Comment No. 323-4**

The distance from the port to the DOE management site is only one of the considerations in selecting ports of entry for the foreign research reactor spent nuclear fuel. Other considerations such as port population, route population, port experience with handling containers, and access to the ocean would also be considered in making the final selection of port of entry. Appendix D, Section D.1.9 of the EIS presents details of the port selection process.

Actually, prior to its deposition in the geologic repository, the foreign research reactor spent nuclear fuel (if it is accepted by the United States), would first be stored at a DOE management site. As stated in the last paragraph of the response to Comment 323-2, the foreign research reactor spent nuclear fuel will be managed at the Savannah River Site (aluminum-based fuels) or the Idaho National Engineering Laboratory (all other type fuels). Thus, no foreign research reactor spent nuclear fuel will be either managed or reprocessed at the Nevada Test Site.

It should also be noted that the Yucca Mountain site in Nevada is currently being studied for potential use as the final geologic repository, not a site in Arizona.

**Response to Comment No. 323-5**

The commentor's preference for using Galveston, Texas, or Savannah, Georgia for the eastern ports of entry, and Concord NWS for the western port of entry is noted. Section 4.2.2 of the EIS demonstrates that the risk associated with bringing foreign research reactor spent nuclear fuel through these ports, or through any of the ports analyzed in the EIS, is low.

**Response to Comment No. 323-6**

The commentor's preference for overseas reprocessing with disposal in the United States is noted. This is Management Alternative 2, Subalternative 1b, which is discussed in Sections 2.3 and 4.4.2 of the EIS.

**COMMENTOR NO. 323: KUEBER, MARY E. (CONT'D.)****RESPONSE TO COMMENT  
COMMENTOR NO. 323: KUEBER, MARY E.**

(3)

-Thomas Grumbly, DOE assistant secretary for environmental restoration and waste management. Grumbly is a worrier. He predicts that figures currently quoted for the total cost of the cleanup—from \$200 billion to \$300 billion—may not even be close. "It could be a couple of times larger than that," he says. He frets about the notorious storage tanks at Hanford, where so many different wastes have been dumped that no one knows exactly what kind of witches' brew is in them. "Every time the phone rings after 10 o'clock, I think, 'This is it, we've had an event,'" says Grumbly. Like his boss, he thinks the time has come for "throwing open the blinds" to shed some light on the nuclear-waste crisis. The by-products(nuclear) of the cold war has left us with "the single largest environmental and health risk in the nation," he says. (NEWSWEEK, "National Affairs—America's Nuclear Secrets", December 27, 1993, pages 14 & 18.)

Thankyou.

**Response to Comment No. 323-7**  
 The commentator's position that foreign research reactor operators should spend nuclear fuel is noted. However, many foreign research reactor means for disposition of their spent nuclear fuel (Section 1.1 of the EIS) of the proposed policy is to give them a limited period of time to arrange for the return of their spent nuclear fuel, and to encourage conversion to LEU fuel in reactors.

**Response to Comment No. 323-8**  
 See last paragraph of the response to comment 323-2, above.

**Response to Comment No. 323-9**

The intent of the proposed policy is to remove as much U.S.-origin HEU civil programs worldwide and give foreign research reactor operators their reactors to the use of LEU fuels and to make arrangements for direct disposal of spent nuclear fuel (Section 1.2 of the EIS).

**Response to Comment No. 323-10**

The commentator's preference for overseas reprocessing with disposal is noted. This is Management Alternative 2, Subalternative 1b, which Sections 2.3 and 4.4.2 of the EIS.

Sincerely,

*Mary E. Kueber, Ph.D.*  
 Mary E. Kueber, B.S., M.A., Ph.D.  
 Environmental Science

**COMMENTOR No. 324: HAZLETON, DEANNE**

**RESPONSE TO COMMENT  
COMMENTOR No. 324: HAZLETON, DEANNE**

Deanne Hazleton  
Tucson, MA 01945

Nuclear technology is not adequately protected and developed for safety. We cannot guarantee the safety of our spouses, our children or our children's children. (See p. 45C ALL 0 (A) my major in (de-hazardous hazardous materials taught us enough.) No Nuclear Waste Repository!!!

**324.1**

**Response to Comment No. 324-1**

The commentor's opposition to nuclear technology is noted. Section 4 of the EIS demonstrates that the risks of the proposed action would be low.